

**Missouri Department of
Natural Resources
Water Protection Program**

Total Maximum Daily Load (TMDL)

for

**Blue River and Indian Creek
Jackson County, Missouri**

DRAFT

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**DRAFT Total Maximum Daily Loads (TMDLs)
For Blue River and Indian Creek
Pollutant: Bacteria (*E. coli*)**

Names: Blue River
Indian Creek

Location: Near Kansas City in
Jackson County, Mo.

Hydrologic Unit Code: 1030010101

**Water Body Identification Numbers:
and Missouri Stream Classifications¹:**

0417 – Blue River P
0418 – Blue River P
0419 – Blue River P
0421 – Blue River C
0420 – Indian Creek C



Designated Beneficial Uses:

- Livestock and Wildlife Watering
- Protection of Warm Water Aquatic Life
- Protection of Human Health (Fish Consumption)
- Whole Body Contact Recreation – Category A (0419 and 0420)
- Whole Body Contact Recreation – Category B (0417, 0418 and 0421)
- Secondary Contact Recreation (0418, 0419 and 0421)
- Industrial (0417, 0418 and 0420)

Pollutant and Impaired Use:

- Bacteria (*Escherichia coli* or *E. coli*) – Whole Body Contact Recreation (A and B) and Secondary Contact Recreation (WBID 0419).

Lengths and Locations of Impaired Segments²:

0417 – 4.4 miles, Mouth (Sec. 29, T50N, R32W) to Guinotte Dam (Sec. 6, T49N, R32W)
0418 – 9.4 miles, Guinotte Dam (Sec. 6, T49N, R32W) to 59th Street (Sec. 2, T48N, R33W)
0419 – 7.7 miles, 59th Street (Sec. 2, T48N, R33W) to Bannister Road (Sec. 28, T48N, R33W)
0421 – 12 miles, Bannister Road (Sec. 28, T48N, R33W) to State Line (Sec. 31, T47N, R33W)
0420 – 3.4 miles, Mouth (Sec. 28, T48N, R33W) to State Line (Sec. 31, T48N, R33W)

¹ Class P streams maintain flow even during drought conditions. Class C streams may cease to flow in dry periods but maintain permanent pools that support aquatic life. See Missouri Water Quality Standards 10 Code of State Regulations [CSR] 20-7.031(1)(F)4 at: www.sos.mo.gov/adrules/csr/current/10csr/10c20-7.pdf.

² Lengths of impaired segments reflect full classified water body lengths as per Missouri's Water Quality Standards (10 CSR 20-7.031 Table H) effective October 2009, and approved by the U.S. Environmental Protection Agency, or EPA, on August 16, 2011. These lengths differ from those identified as approved by EPA on the 2010 303(d) List of impaired waters, which incorrectly lists mileages from an earlier version of Missouri's Water Quality Standards.

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1 Introduction

The Blue River and Indian Creek Total Maximum Daily Loads, or TMDLs, are being established in accordance with Section 303(d) of the federal Clean Water Act. These water quality-limited segments flowing through Kansas City in Jackson County, Mo. are included on the U.S. Environmental Protection Agency approved Missouri 2010 303(d) List of impaired waters.

The purpose of a TMDL is to determine the pollutant loading that a water body can assimilate without exceeding the water quality standards for that pollutant. Water quality standards are benchmarks used to assess the quality of rivers and lakes. The TMDL also establishes the pollutant loading capacity necessary to meet Missouri water quality standards based on the relationship between pollutant sources and in-stream water quality conditions. The TMDL consists of a wasteload allocation, a load allocation and a margin of safety. The wasteload allocation is the portion of the allowable pollutant load that is allocated to point sources. The load allocation is the portion of the allowable pollutant load that is allocated to nonpoint sources. The margin of safety accounts for the uncertainty associated with water quality model assumptions and data limitations.

Blue River was originally listed as impaired by chlordane on Missouri's 1998 303(d) List of impaired waters. A TMDL was completed by the Missouri Department of Natural Resources and approved by EPA in 2001. The currently identified impairment for bacteria was first placed on the 2004/2006 303(d) List, with the source of the impairment identified as urban runoff. For the 2010 303(d) List the identified source has been modified slightly to urban nonpoint source.

Indian Creek was originally listed as impaired by fecal coliform on Missouri's 2002 303(d) List. This pollutant was revised to bacteria for the 2004/2006 List after the criterion used for establishing recreational use was changed from fecal coliform to *E. coli* bacteria in Missouri's 2005 Water Quality Standards. In addition, chloride was added as a pollutant on the 2004/2006 List and a TMDL to address the chloride impairment is scheduled to be developed in 2014. The sources of the bacteria impairment have been identified as originating from multiple point and nonpoint sources.

The city of Kansas City, Mo. is operating under a consent decree³ settlement, lodged in the U.S. District Court for the Western District of Missouri on May 18, 2010, to address ongoing violations of the federal Clean Water Act. There are currently about 87 identified combined sewer overflow outfalls that are authorized to discharge to the Blue River watershed during wet weather conditions. The consent decree compels the city, among other things, to implement its Overflow Control Plan which was developed by the city's Water Service Department to reduce or eliminate overflows of untreated sewage from the city's wastewater collection and treatment system, and to reduce the levels of pollutants in area streams contributed by urban stormwater. The plan acknowledges that these goals require an adaptive watershed management approach incorporating not only conventional source reduction techniques, but also emerging strategies such as development and use of green infrastructure and stormwater best management practices,

³ *United States of America v. The City of Kansas City, Missouri*, No. 4:10-cv-0497-GAF, May 18, 2010.

or BMPs. To that end, early implementation of the plan is slated to begin with a focus on the Blue River watershed, including development of a Blue River Watershed Management Plan, as well as the Middle Blue River Basin Green Infrastructure Pilot Project, which is already underway (Kansas City 2009). The Overflow Control Plan was completed in January of 2009, and is scheduled to be implemented over the course of 25 years or more.

Blue River is also currently on the Kansas 303(d) List of impaired waters, where it is identified as violating that state's water quality criteria for dissolved oxygen and mercury. It has previously been listed for impairments to aquatic life and recreational use (due to fecal coliform), and TMDLs to address these impairments were completed and approved by EPA in 2001. Indian Creek is also currently identified on the Kansas 303(d) List as violating that state's water quality criteria for total phosphorus and chloride, and previous TMDLs approved in 2001 have addressed fecal coliform and nitrate impairments.

2 Background

This section of the report provides information on the Blue River watershed, including Indian Creek.

2.1 The Setting

Blue River is formed from the confluence of Wolf Creek and Coffee Creek in Johnson County, Kan. and flows northeast for about 40 miles to its mouth at the Missouri River in Jackson County, Mo. In Kansas, Blue River flows along the southern boundary of the city of Overland Park, and in Missouri the river flows through Kansas City. The whole length of the Blue River in Missouri is comprised of four classified stream segments totaling 33.5 miles (see page ii). Blue River drains a predominantly urban watershed of roughly 275 square miles, comprised of 113 square miles (41 %) in Missouri and 162 square miles (59 %) in Kansas (Figure 1).

Indian Creek is a tributary to Blue River. With its headwaters also originating in Johnson County, Kan., in the city of Olathe, it flows east for about 23 miles to its confluence with Blue River. The majority of the length of Indian Creek is in Kansas, with the portion in Missouri being a 3.4 mile long classified segment. The location and extent of the Indian Creek watershed can also be found in Figure 1.

The impaired length of Blue River in Missouri is 33.5 miles and the impaired length of Indian Creek is 3.4 miles, the full length of the classified segments for each of these water bodies in Missouri (see footnote 2). The classified segments correspond to those portions of the stream defined in Missouri's water quality standards (10 CSR 20-7.031 Table H); the impaired segments correspond to those portions of the stream determined to not be meeting water quality standards. In the case of Blue River and Indian Creek, the lengths of the classified segments and impaired segments are the same. (Missouri Secretary of State, 2009).

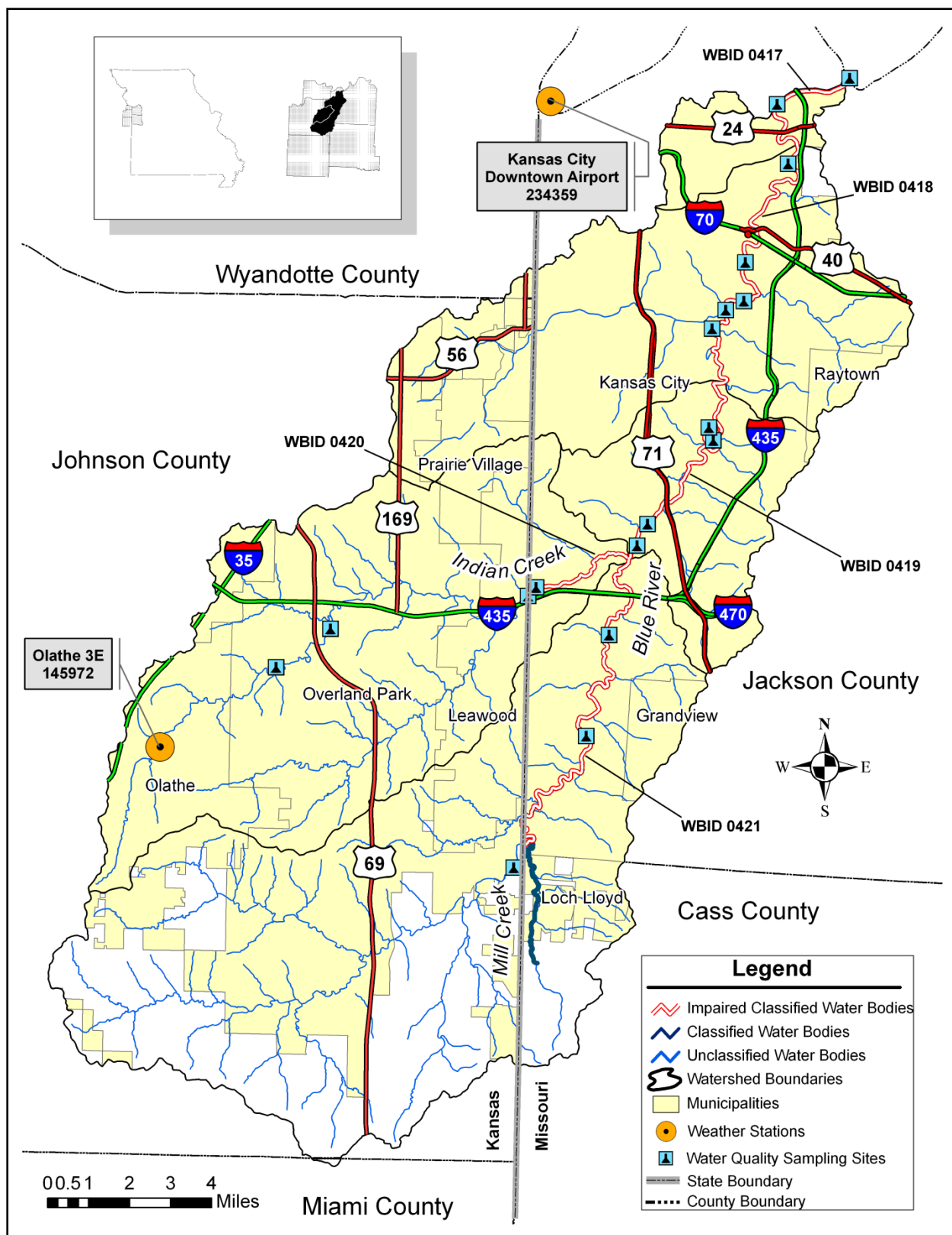


Figure 1. Blue River and Indian Creek watersheds (with subwatersheds)

2.2 Population

Based on spatial analysis by the Department using 2000 census block data, the Blue River watershed is estimated to have a population of approximately 540,537 people (U.S. Census Bureau 2000 and 2001a). The population is split roughly equally between Missouri and Kansas, with about 268,428 people in the Missouri portion of the watershed, and a population of 272,109 in Kansas. This estimation was completed by using geographic information system software and superimposing the watershed boundary over a map of census blocks containing population data. Whenever the centroid of a census block fell within the watershed boundary, its total population was included in the total. If the centroid of the census block was outside the watershed boundary, then the population was excluded.

The overall population in the Blue River watershed is predominantly urban, and this urban population can be estimated using a method similar to the one used for the entire watershed. Again using 2000 census block data, the estimation is derived by totaling the population for census blocks having centroids within the municipal areas located within the watershed. This method results in an estimated urban population of approximately 532,619 people, once again split about equally between Missouri and Kansas. The non-urban population of the watershed can also be estimated by subtracting the urban population from the total watershed population. This results in an estimated non-urban population in the watershed of approximately 7,918 people.

The Indian Creek watershed, with a population of 216,677, is entirely urban and accounts for about 40 percent of the total population of the Blue River watershed. See Table 1 for a complete breakdown of population in the Blue River and Indian Creek watersheds.

**Table 1. Population in the Blue River and Indian Creek watersheds
(U.S. Census Bureau 2000 and 2001a)**

	Blue River					Indian Creek				
	Urban	Non-urban	Total	Percent Urban	Percent Non-urban	Urban	Non-urban	Total	Percent Urban	Percent Non-urban
Missouri	267384	1044	268428	99.6	0.4	18752	0	18752	100	0
Kansas	265235	6874	272109	97.5	2.5	197925	0	197925	100	0
TOTAL	532619	7918	540537	98.5	1.5	216677	0	216677	100	0
Percent in Missouri	50.2	13.2	49.7			8.7	--	8.7		
Percent in Kansas	49.8	86.8	50.3			91.3	--	91.3		

EPA completed a similar analysis using 2000 census data and 12-digit hydrologic unit code watershed boundaries and determined that the Blue River and Indian Creek watersheds in

Missouri are Priority 1 Environmental Justice watersheds.⁴ This means that these watersheds are in a category defined as having the greatest proportion of total area determined by the agency to be Environmental Justice areas. Environmental Justice areas are determined by the percentage of minorities and/or the percentage of the population below the poverty level in the 2000 U.S. Census. Environmental Justice watersheds are determined using this information along with the total watershed area and total population (EPA 2011a and Steve Schaff, EPA, e-mail communication, June 30, 2011). Environmental Justice communities may qualify for financial and strategic assistance for addressing environmental and public health issues (EPA 2011b).

2.3 Geology, Physiography and Soils

Blue River and Indian Creek are located the Central Plains/Blackwater/Lamine Ecological Drainage Unit⁵, or EDU, in the Central Plains aquatic subregion⁶. The Blue River watershed includes pieces of four distinct level IV ecoregions. A small portion of the downstream end of Blue River flows through the Rolling Loess Prairie ecoregion before joining the Missouri River in the Missouri Alluvial Plain. The Wooded Osage Plains ecoregion dominates the majority of the watershed in Missouri and into Kansas. This region is characterized by non-glaciated, gently rolling upland prairie broken by low limestone escarpments and wide stream valleys. Presettlement vegetation was a mixture of oak-hickory woodlands and bluestem prairie, with a greater concentration of woodlands than in more western regions. The Osage Cuestas ecoregion dominates the western portion of the watershed and offers somewhat more topographic relief. Potential natural vegetation in the Blue River area of this region is primarily a mixture of tallgrass prairie and oak-hickory woodlands. Overall topography ranges from flat, in the river valleys, to gently rolling plains in the uplands. The glaciated Loess Prairie and Alluvial Plain regions are characterized by loess and clay loam till over Pennsylvanian and Cretaceous shale, sandstone and limestone. The Osage Cuestas and Wooded Osage Plains regions are unglaciated and dominated by clayey residuum overlaying Pennsylvanian-age bedrock, with alternating deposits of sandstone, shale and limestone. (Chapman, *et al.* 2001 and Chapman, *et al.* 2002).

Spatial analysis conducted by the Department indicates that there are approximately 76 individual soil types represented within the Blue River watershed. Soils in the watershed consist chiefly of silt loams and silty clay loams, and greater than a third of the watershed is identified as being in one or another category of urban land complex (NRCS 2009 and 2010). These urban land complexes are generally described as consisting of 60-70 percent urban land – covered by impervious surfaces – with most of the remainder identified by soil type. The majority of soils associated with the urban land complexes in this watershed are also silt loams or silty clay loams (SCS 1984).

⁴ EPA defines Environmental Justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations and policies.

⁵ Ecological Drainage Units are groups of watersheds having generally similar biota, geography, and climatic characteristics (USGS 2009).

⁶ Missouri's three aquatic subregions are the Central Plains, the Mississippi Alluvial Basin, and the Ozark (Sowa, *et al.* 2005).

Table 2 provides a summary of hydrologic soil groups in the Blue River and Indian Creek watershed, and Figure 2 shows the location and distribution of these soil groups throughout the watershed. Hydrologic soil groups categorize soils by their runoff potential. A soil's hydrologic soil group relates to the rate at which water enters the soil profile, which in turn affects the potential amount of water entering the stream as runoff. Group A represents soils with the highest rate of infiltration (lowest runoff potential) and group D represents soils with the lowest rate of infiltration (highest runoff potential). The dominant hydrologic soil groups in the Blue River watershed, and in each of the subwatersheds, including Indian Creek, are Groups B and C. These two groups are roughly equal in proportion, and together account for over 80 percent of the soils in these watersheds. Soils in the Group B category have a moderately low runoff potential (higher rate of infiltration) and are dominated by loamy sand or sandy loam textures, often with some component of silt or silt loam. Soils in the Group C category have a moderately high runoff potential (lower rate of infiltration). These also typically have a loamy or silt loam texture, but with a higher component of clay than the Group B soils. What is characteristic of both of these hydrologic soil groups that dominate the Blue River watershed is that their runoff potentials are relatively moderate – neither excessively high nor excessively low (NRCS 2007). It should also be remembered, however, that a significant portion of the soils in the watershed have been covered by impervious surfaces, or have otherwise been impacted or disturbed by urbanization. What this means is that runoff in the watershed, to the extent that it impacts water quality, may more likely be a function of human disturbance and urbanization than a function of natural soil conditions.

Table 2. Hydrologic soil groups in the Blue River and Indian Creek watersheds (NRCS 2009 and 2010)

Hydrologic Soil Group	Group A	Group B	Group C	Group C/D	Group D	Not Rated
WBID 0417						
Square Miles	1.35	114	109.9	1.3	41.3	2.6
Percentage	0.5%	42.1%	40.6%	0.5%	15.3%	1.0%
WBID 0418						
Square Miles	1.3	111.7	109.6	1.2	36.9	2.5
Percentage	0.5%	42.4%	41.6%	0.5%	14.0%	1.0%
WBID 0419						
Square Miles	0.8	86.9	85.8	1.1	30.5	1.8
Percentage	0.4%	42.0%	41.4%	0.5%	14.8%	0.9%
WBID 0420						
Square Miles	0	32.4	31.6	0.2	10.1	0.4
Percentage	0%	43.4%	42.2%	0.3%	13.5%	0.6%
WBID 0421						
Square Miles	0	44.3	43.7	0.7	19.4	0.8
Percentage	0%	40.7%	40.2%	0.6%	17.8%	0.7%

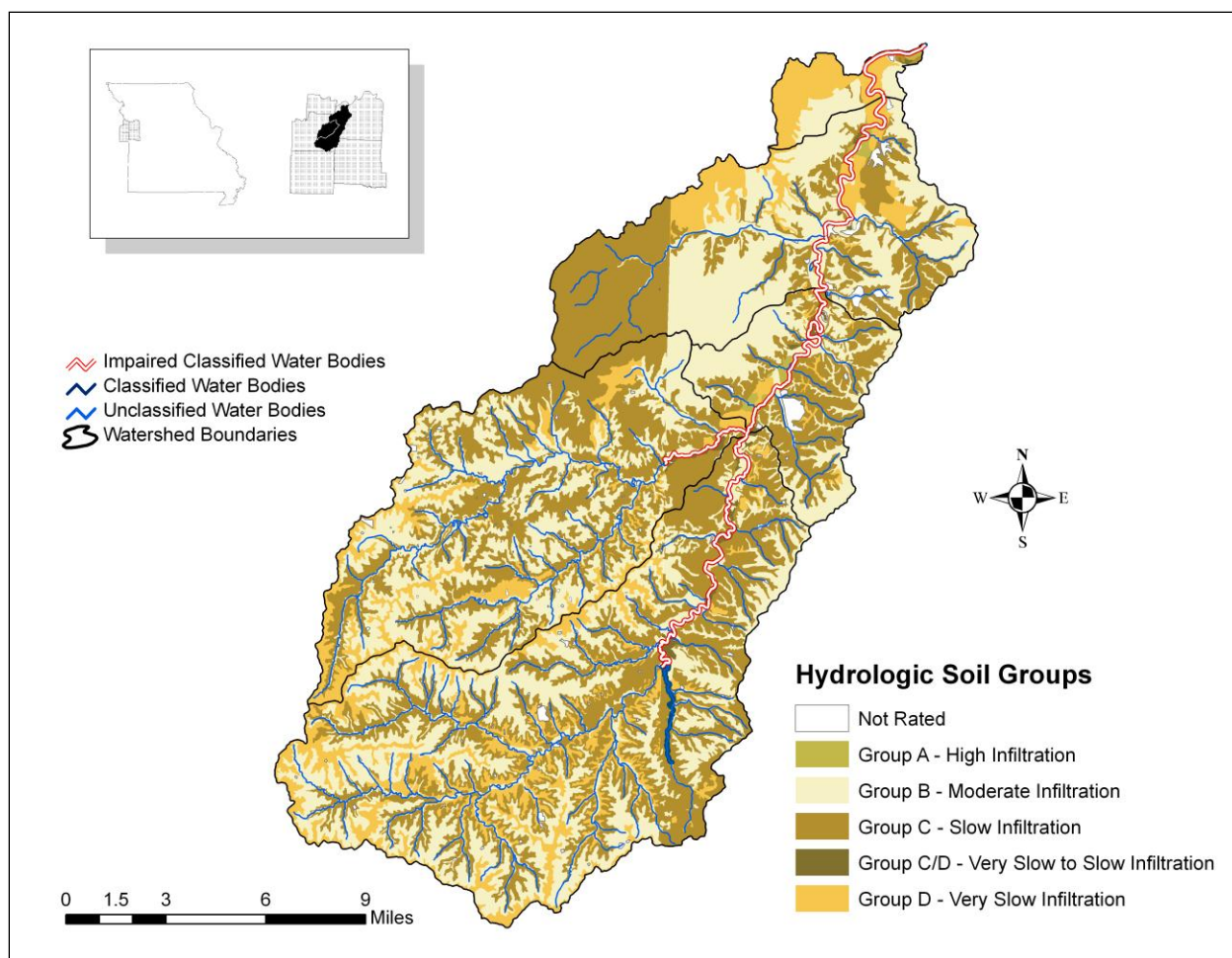


Figure 2. Hydrologic soil groups in the Blue River and Indian Creek watersheds (NRCS 2009 and 2010)

2.4 Rainfall and Climate

Weather stations provide useful information for developing a general understanding of climatic conditions in the watershed. The Olathe weather station and the Kansas City Downtown Airport weather station are the closest sources to the Blue River and Indian Creek watersheds with recent and available weather and climate data, and are representative of weather conditions in the watersheds. The Olathe station is located in the southern half of the Blue River watershed, within the Indian Creek subwatershed in Johnson County, Kan. (Figure 1). The Kansas City Downtown Airport station is located just outside of the northern tip of the watershed in Clay County, Mo., approximately 5 miles west of the Blue River. Both stations record daily precipitation, daily maximum and minimum temperatures, snowfall and snow depth. Figure 3 provides a summary of precipitation and climate data for the Olathe and Kansas City stations based on 30-year totals (1981–2010) (NOAA 2011). The annual average precipitation and the average daily minimum and maximum temperatures over the 30-year period are 41.43 inches and 45.6/65.2 degrees Fahrenheit (°F) for the Olathe station. The annual average precipitation and the average daily minimum and maximum temperatures are 38.49 inches and 47.5/65.9°F for the

Kansas City station. Precipitation is one important factor related to stream flow and storm water runoff events that can be associated with nonpoint source pollutants. In the case of Blue River, precipitation events can also contribute to sanitary sewer overflows and combined sewer overflows. Other factors contributing to stream flow and stormwater runoff include temperature, rates of evapotranspiration, antecedent soil moisture and the extent of impervious surfaces in the watershed.

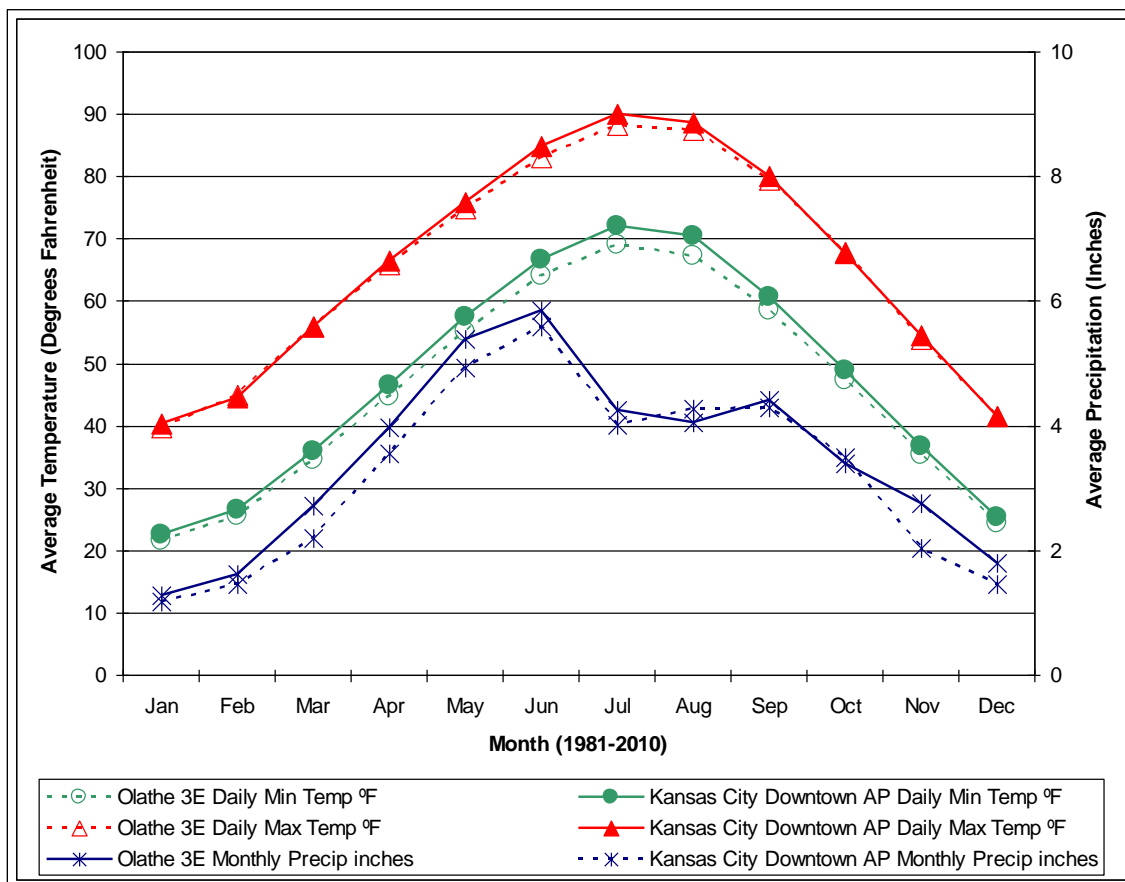


Figure 3. Thirty Year Monthly Temperature and Precipitation Averages for Olathe 3E and Kansas City Downtown Airport Weather Stations

2.5 Land Use and Land Cover

The land use and land cover of the Blue River watershed is summarized by state, as well as for the entire watershed, for each of the impaired segments. Table 3 through 6 summarize land use and land cover for the watersheds associated with Blue River classified water body segments 0417, 0418, 0419 and 0421. Table 7 summarizes land use and land cover for the watershed

associated with Indian Creek, classified water body segment 0420⁷. Figure 4 depicts the land use and land cover for each of these watersheds. These watersheds are dominated by Kansas City and the surrounding metropolitan area, and the dominant land uses and land covers for the entire Blue River watershed in Missouri and Kansas (associated with water body segment 0417) are urban (65 percent), grassland (17 percent) and forest and woodland (11 percent), with cropland accounting for nearly 6 percent of the watershed. The dominant land uses and land covers for the entire Indian Creek watershed are urban (98 percent), grassland (0.8 percent) and forest and woodland (0.8 percent), with cropland accounting for only 0.3 percent of the watershed. These categories also reflect the dominant land use and land cover in each state. Because of the largely urban nature of these watersheds, particularly in the Indian Creek watershed, areas classified as grassland or forest and woodland may include golf courses, cemeteries, parks, and school playgrounds. Non-urban land uses do appear to exist in the Blue River watershed and are concentrated in the eastern part of the watershed in Missouri, and the southern portion in Kansas.

**Table 3. Land use and land cover in the Blue River watershed (0417)
(MoRAP 2005 and KARS 2008).**

Land Use/ Land Cover	Missouri			Kansas			Entire Watershed		
	Watershed Area			Watershed Area			Watershed Area		
	Acres	Square Miles	Percent	Acres	Square Miles	Percent	Acres	Square Miles	Percent
Urban	45478	71.1	63.1	66839	104.4	66.1	112317	175.5	64.8
Cropland	3861	6.0	5.3	5740	9.0	5.7	9602	15.0	5.5
Grassland	8124	12.7	11.3	21796	34.1	21.5	29920	46.8	17.3
Forest/Woodland	12529	19.5	17.4	6270	9.8	6.2	18799	29.4	10.9
Open Water	878	1.4	1.2	406	0.6	0.4	1284	2.0	0.7
Barren	54	0.1	0.1	103	0.2	0.1	156	0.2	0.1
Herbaceous	286	0.4	0.4	ND	ND	ND	286	0.4	0.2
Wetland	868	1.4	1.2	ND	ND	ND	868	1.4	0.5
Total	72078	112.6	100	101154	158.1	100	173232	270.7	100

Note: MoRAP = Missouri Resource Assessment Partnership

KARS = Kansas Applied Remote Sensing Program

ND = No Data. At the time of this TMDL, data were not available to estimate area of herbaceous and wetland land cover in Kansas.

⁷ Note that due to rounding of numbers for presentation purposes in Tables 3 through 7, the sums of the land use categories do not always appear equal to the totals. For the same reason, total watershed areas in these tables do not necessarily equal watershed areas presented in other tables in this document, and they may appear slightly different from those used in development of load duration curves (Section 6).

Table 4. Land use and land cover in the Blue River watershed (0418)

Land Use/ Land Cover	Missouri			Kansas			Entire Watershed		
	Watershed Area			Watershed Area			Watershed Area		
	Acres	Square Miles	Percent	Acres	Square Miles	Percent	Acres	Square Miles	Percent
Urban	41325	64.6	61.2	66839	104.4	66.1	108164	169.0	64.1
Cropland	3858	6.0	5.7	5740	9.0	5.7	9598	15.0	5.7
Grassland	7945	12.4	11.7	21796	34.1	21.5	29741	46.5	17.6
Forest/Woodland	12417	19.4	18.4	6270	9.8	6.2	18687	29.2	11.1
Open Water	791	1.2	1.2	406	0.6	0.4	1197	1.9	0.7
Barren	54	0.1	0.1	103	0.2	0.1	156	0.2	0.1
Herbaceous	286	0.4	0.4	ND	ND	ND	286	0.4	0.2
Wetland	857	1.3	1.3	ND	ND	ND	857	1.3	0.5
Total	67533	105.4	100	101154	158.1	100	168688	263.6	100

Table 5. Land use and land cover in the Blue River watershed (0419)

Land Use/ Land Cover	Missouri			Kansas			Entire Watershed		
	Watershed Area			Watershed Area			Watershed Area		
	Acres	Square Miles	Percent	Acres	Square Miles	Percent	Acres	Square Miles	Percent
Urban	19037	29.7	48.1	58718	91.7	63.1	77755	121.5	58.7
Cropland	3717	5.8	9.4	5741	9.0	6.2	9458	14.8	7.1
Grassland	6190	9.7	15.7	21791	34.0	23.4	27981	43.7	21.1
Forest/Woodland	8991	14.0	22.7	6266	9.8	6.7	15257	23.8	11.5
Open Water	596	0.9	1.5	406	0.6	0.4	1002	1.6	0.8
Barren	0	0.0	0.0	103	0.2	0.1	103	0.2	0.1
Herbaceous	286	0.4	0.7	ND	ND	ND	286	0.4	0.2
Wetland	729	1.1	1.8	ND	ND	ND	729	1.1	0.5
Total	39546	61.6	100.0	93025	145.4	100	132571	207.1	100

Table 6. Land use and land cover in the Blue River watershed (0421)

Land Use/ Land Cover	Missouri			Kansas			Entire Watershed		
	Watershed Area			Watershed Area			Watershed Area		
	Acres	Square Miles	Percent	Acres	Square Miles	Percent	Acres	Square Miles	Percent
Urban	6060	9.5	29.4	15313	23.9	31.1	21374	33.4	30.6
Cropland	3297	5.2	16.0	5595	8.7	11.4	8892	13.9	12.7
Grassland	4890	7.6	23.7	21530	33.6	43.8	26420	41.3	37.9
Forest/Woodland	5085	7.9	24.7	6228	9.7	12.7	11313	17.7	16.2
Open Water	446	0.7	2.2	405	0.6	0.8	851	1.3	1.2
Barren	0	0.0	0.0	103	0.2	0.2	103	0.2	0.1
Herbaceous	286	0.4	1.4	ND	ND	ND	286	0.4	0.4
Wetland	557	0.9	2.7	ND	ND	ND	557	0.9	0.8
Total	20621	32.2	100.0	49174	76.8	100	69795	109.1	100

Table 7. Land use and land cover in the Indian Creek watershed (0420)

Land Use/ Land Cover	Missouri			Kansas			Entire Watershed		
	Watershed Area			Watershed Area			Watershed Area		
	Acres	Square Miles	Percent	Acres	Square Miles	Percent	Acres	Square Miles	Percent
Urban	3498	5.4	86.5	43380	67.8	98.9	46877	73.2	97.9
Cropland	23	0.0	0.6	135	0.2	0.3	158	0.2	0.3
Grassland	104	0.2	2.6	284	0.4	0.6	388	0.6	0.8
Forest/Woodland	324	0.5	8.0	59	0.1	0.1	383	0.6	0.8
Open Water	37	0.1	0.9	2	0	0	39	0.1	0.1
Barren	0	0	0	0	0	0	0	0	0
Herbaceous	0	0	0	ND	ND	ND	0	0	0
Wetland	55	0.1	1.4	ND	ND	ND	55	0.1	0.1
Total	4041	6.3	100	43860	68.5	100	47901	74.8	100

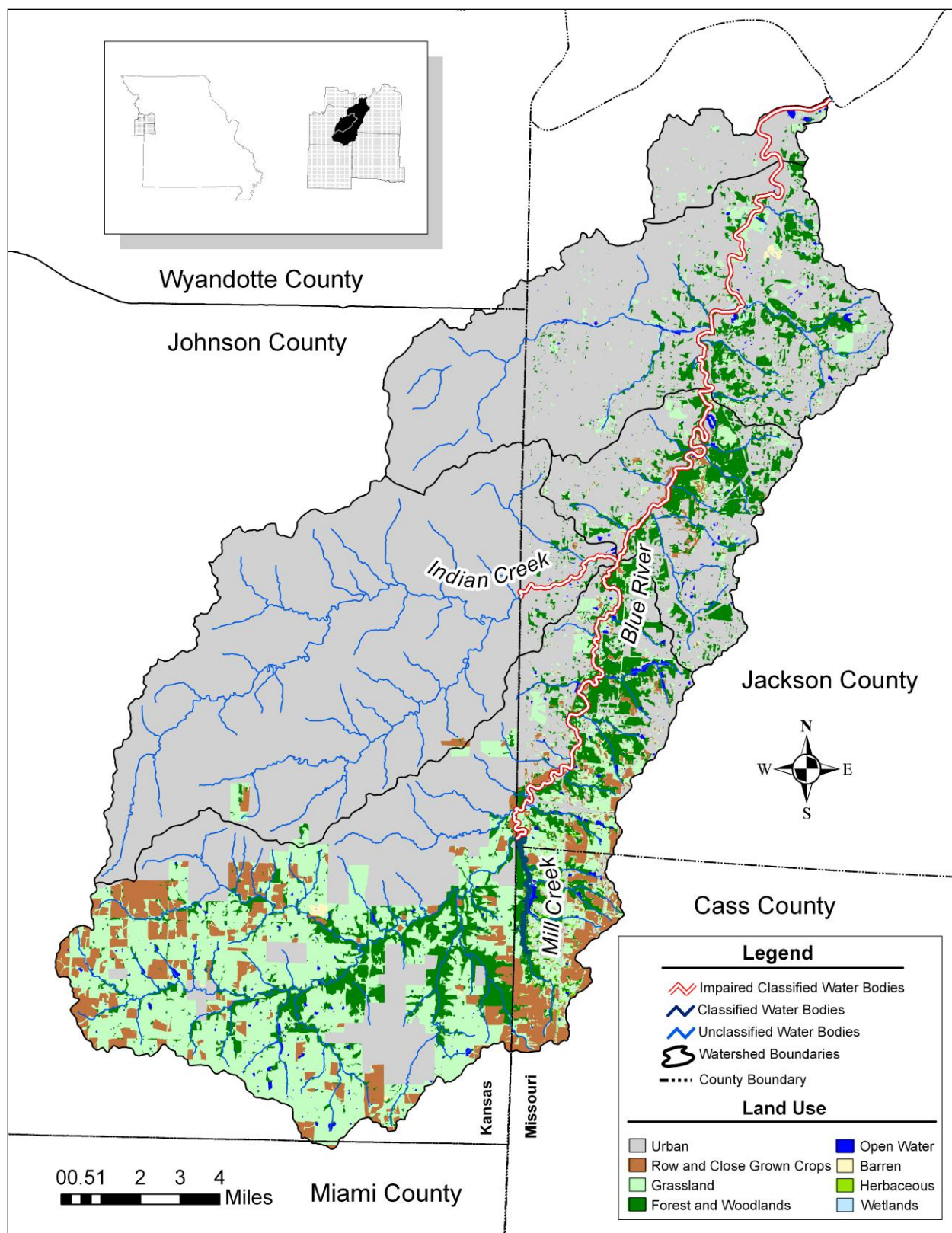


Figure 4. Land use and land cover in the Blue River and Indian Creek watersheds (MoRAP 2005 and KARS 2008)

2.6 Defining the Problem

Blue River and Indian Creek are listed as impaired by bacteria on Missouri's 2010 303(d) List of impaired waters. This impairment refers to fecal bacteria, which are a concern because excessive amounts of such bacteria in surface water used for recreation are an indication of an increased risk of pathogen-induced illness to humans. Infections due to pathogen-contaminated waters include gastrointestinal, respiratory, eye, ear, nose, throat and skin diseases. *Escherichia coli*, or *E. coli*, are one type of fecal bacteria found in the intestines of warm blooded animals and are used as indicators of the risk of waterborne disease from pathogenic (disease causing) bacteria or viruses (EPA 1997). Most *E. coli* strains are harmless, but some can cause serious illness in humans. The harmless strains are part of the normal flora of the intestines, and can benefit their hosts by preventing the establishment of pathogenic bacteria within the intestine (Hudault et al. 2001 and Reid et al. 2001).

Missouri's Water Quality Standards use *E. coli* as an indicator, and the criteria are based on specific levels of risk of acute gastrointestinal illness that are calculated to be protective of the whole body contact recreation and secondary contact recreation designated uses (Section 4.2). To address these water quality impairments, this TMDL targets instream bacteria levels using *E. coli* as the primary measurement parameter. There are other quantitative indicators of fecal bacteria; however, *E. coli* was selected as the numeric target for bacteria in this TMDL because it is consistent with Missouri's Water Quality Standards, and it enables the use of the most common and accepted sampling methods and techniques and allows the use of the highest-quality data available.

TMDLs are needed for the classified segment of Indian Creek and for the four classified segments of Blue River because these water bodies are not meeting the water quality criteria for *E. coli* bacteria. These impairments were assessed based on water quality samples collected and analyzed by the U.S. Geological Survey, or USGS, the Kansas Department of Health and Environment, or KDHE, and EPA Region 7. These data are of sufficient quality to evaluate compliance with water quality standards and to support TMDL development. The results of these surveys are summarized in Table 8 and displayed in Figure 5. According to the Department's 303(d) listing methodology, at least five water quality samples taken during the recreation season are required to calculate a geometric mean in order to assess impairment based on compliance or exceedance of the *E. coli* criteria. A water body is judged to be impaired if the geometric mean is exceeded in any of the last three years for which adequate data is available. Although a number of the recreational season geometric means do not meet this standard for assessment, they do indicate a frequent exceedance of the bacteria criteria among all five water body segments. A full listing of the data used in the assessment of these impairments is presented in Appendix A.

Table 8. Blue River and Indian Creek annual recreation season *E. coli* geometric means^a, 1998 – 2010

WBID	Year	No. of samples in Recreation Season^b	Recreation Season Geometric Mean	WBC Criterion^c	Exceedance^d
0417	1998	2	465	206	---
	1999	4	1,081		---
	2000	4	2,529		---
	2002	2	297		---
	2004	2	4,996		---
	2005	4	732		---
0418	1998	2	354	206	---
	1999	4	2,215		---
	2000	4	892		---
	2003	7	2,290		Yes
	2004	3	518		---
	2005	9	2,900		Yes
	2006	5	5,674		Yes
	2007	3	5,213		---
	2010	15	911		Yes
0419	1998	2	162	126	---
	1999	4	1,448		---
	2000	4	356		---
	2001	2	147		---
	2002	2	36		---
	2003	6	1,817		Yes
	2004	4	656		---
	2005	12	852		Yes
	2006	5	4,182		Yes
	2007	3	4,268		---
	2010	15	502		Yes
0420	2002	4	941	126	---
	2003	8	5,777		Yes
	2004	6	456		Yes
	2005	8	256		Yes
	2006	7	1,163		Yes
	2007	7	1,750		Yes
	2008	3	418		---
	2009	3	333		---
	2010	2	183		---
0421	2001	2	338	206	---
	2002	2	62		---
	2003	8	3,306		Yes
	2004	6	256		Yes
	2005	7	71		No
	2006	9	1,584		Yes
	2007	7	750		Yes
	2008	3	242		---
	2009	3	331		---
	2010	16	1,265		Yes

- ^a The units for all geometric mean values are counts of *E. coli* present per 100 milliliters of water.
- ^b The recreation season extends from April 1 to October 31 of each year.
- ^c WBC refers to whole body contact. The water quality criteria for *E. coli* are a geometric mean of 126 counts/100 mL of water during the recreation season for whole body contact recreation – category A, and a geometric mean of 206 counts/100 mL of water during the recreation season for whole body contact recreation – category B.
- ^d Exceedance was not evaluated for recreation seasons with fewer than 5 samples.

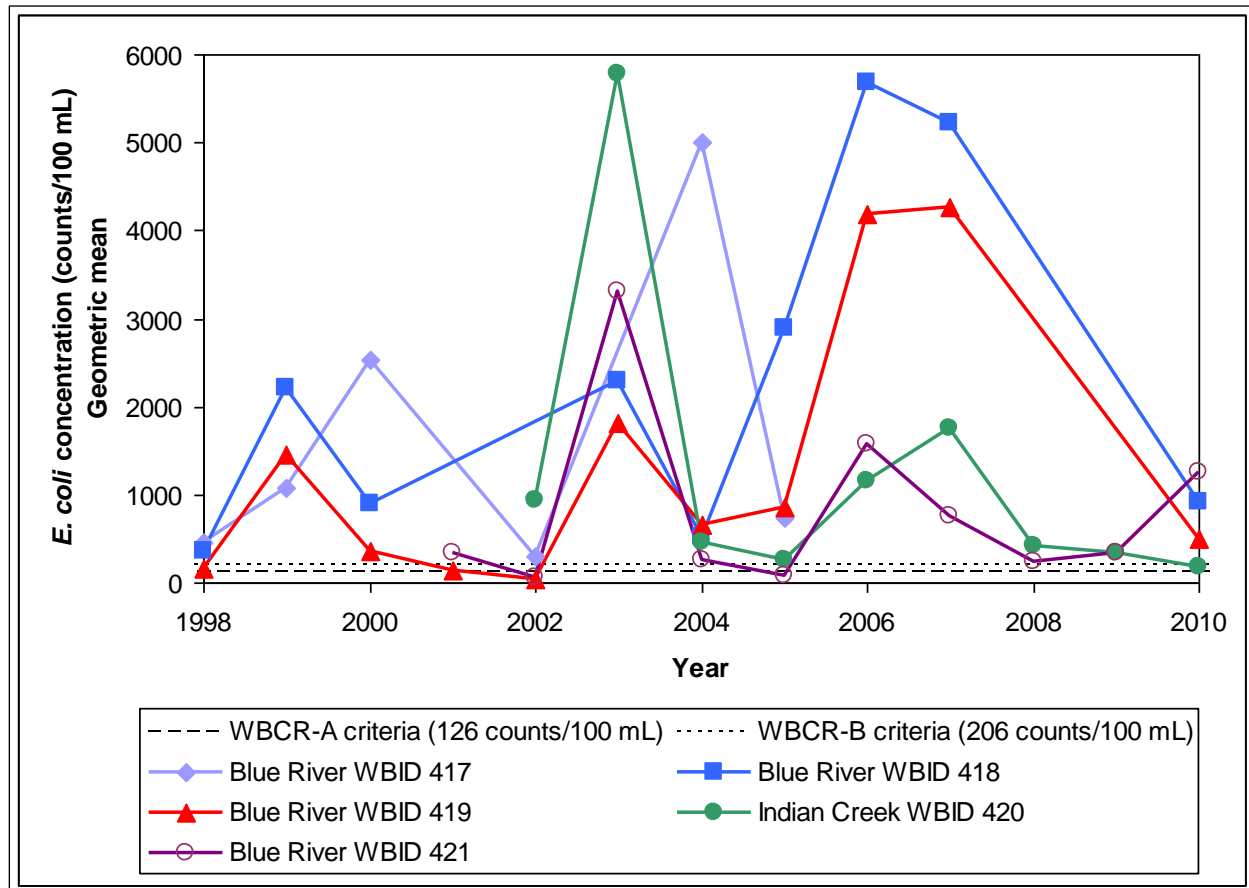


Figure 5. Blue River and Indian Creek annual recreation season *E. coli* geometric means, 1998 – 2010

In addition to presenting the bacteria data as recreational season geometric means by year, Figures 6 through 10 below present box plots for each water body depicting the range of bacteria data, by month, for all of the years for which data is available. As noted in the legend of these figures, the centerline of each plot depicts the median data value for that month; the upper and lower bounds of each box represent the 75th and 25th percentile of data, respectively; and the upper and lower bounds of each whisker represent the maximum and minimum data value, respectively.

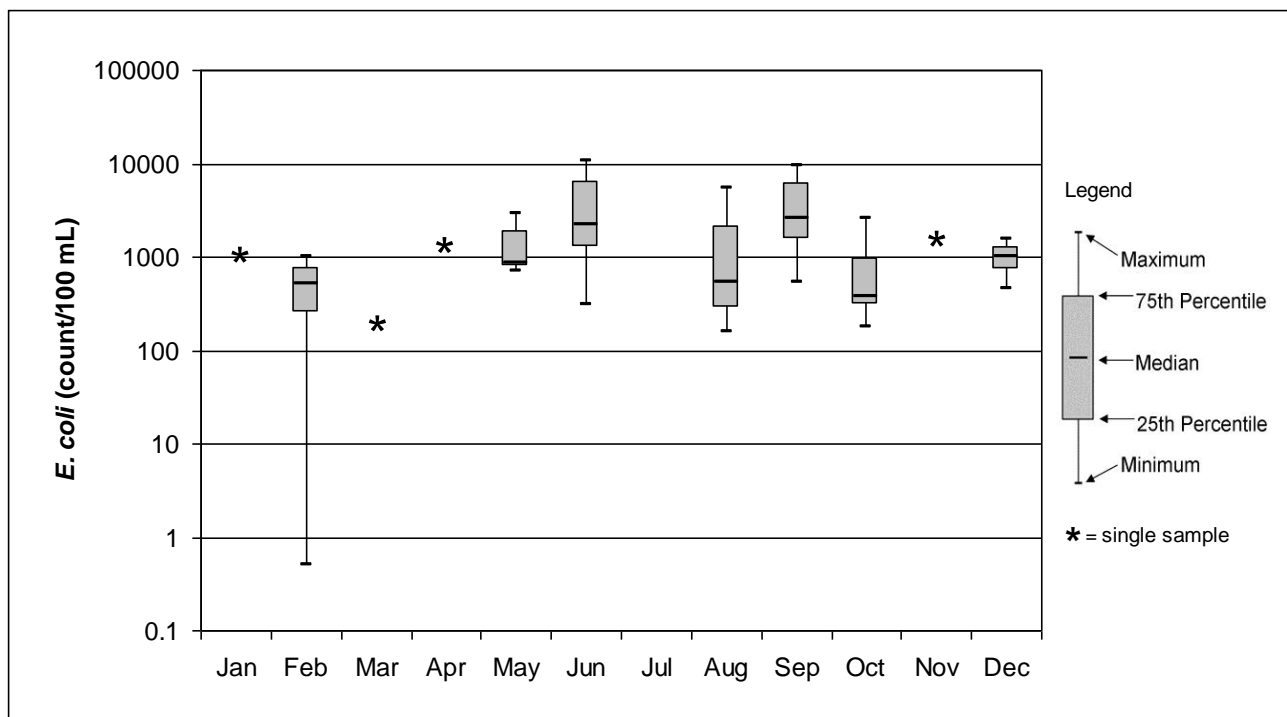


Figure 6. Monthly *E. coli* data for WBID 0417, 1998-2005

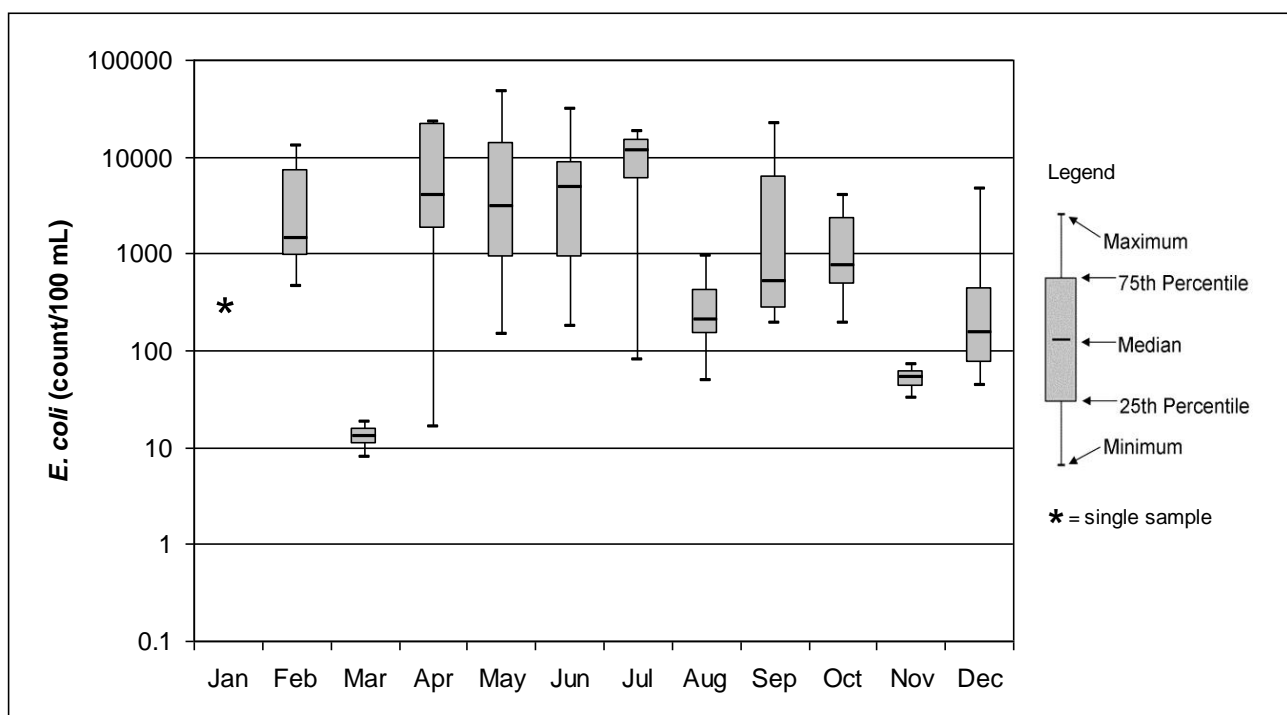


Figure 7. Monthly *E. coli* data for WBID 0418, 1998-2010

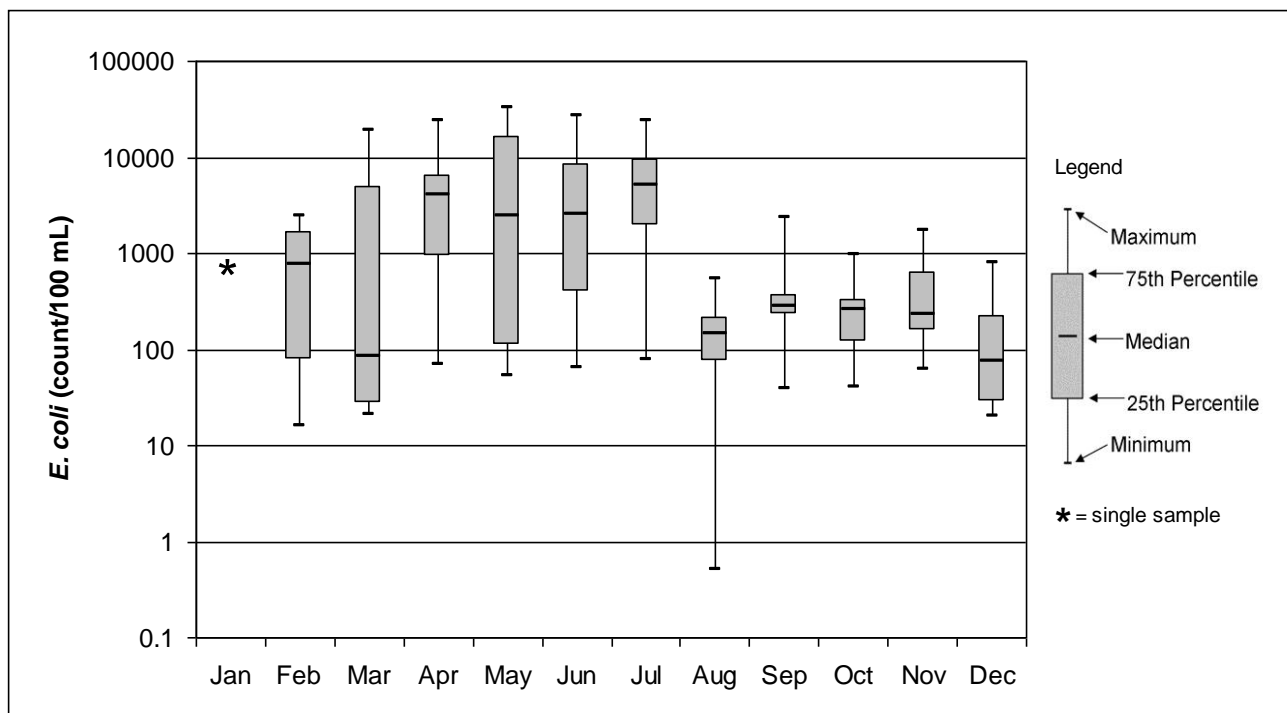


Figure 8. Monthly *E. coli* data for WBID 0419, 1998-2010

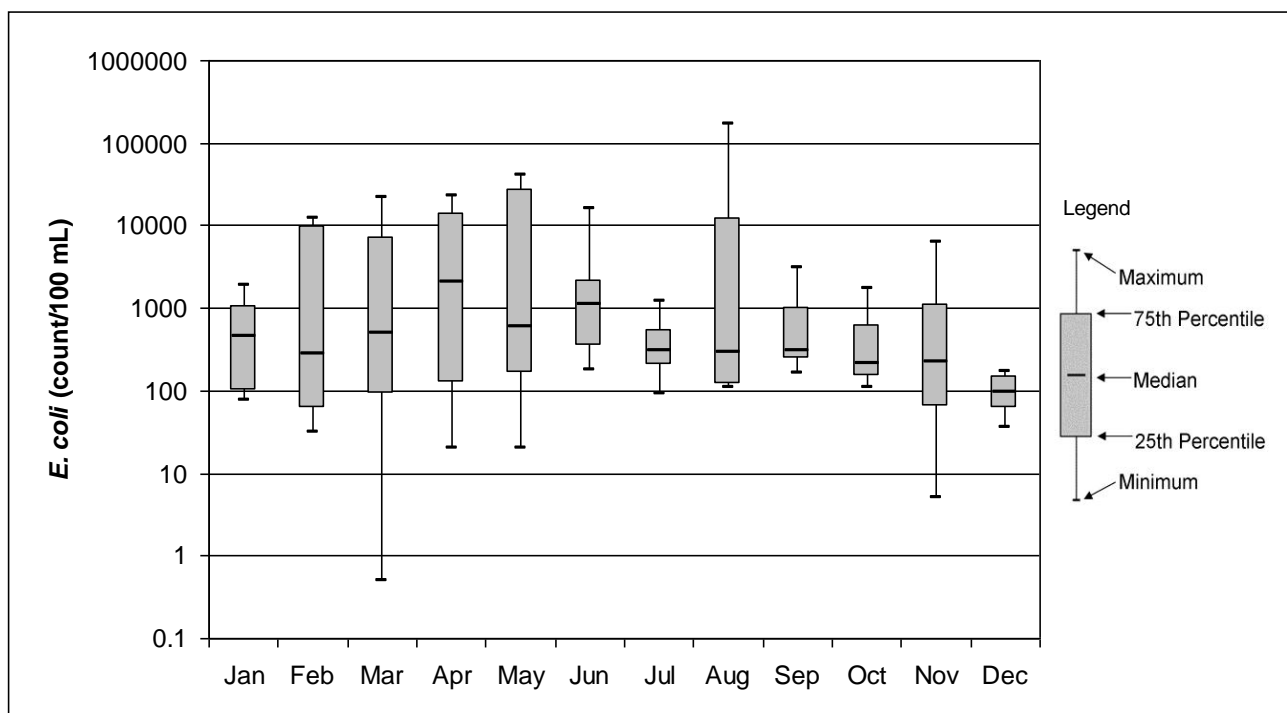


Figure 9. Monthly *E. coli* data for WBID 0420, 2000-2010

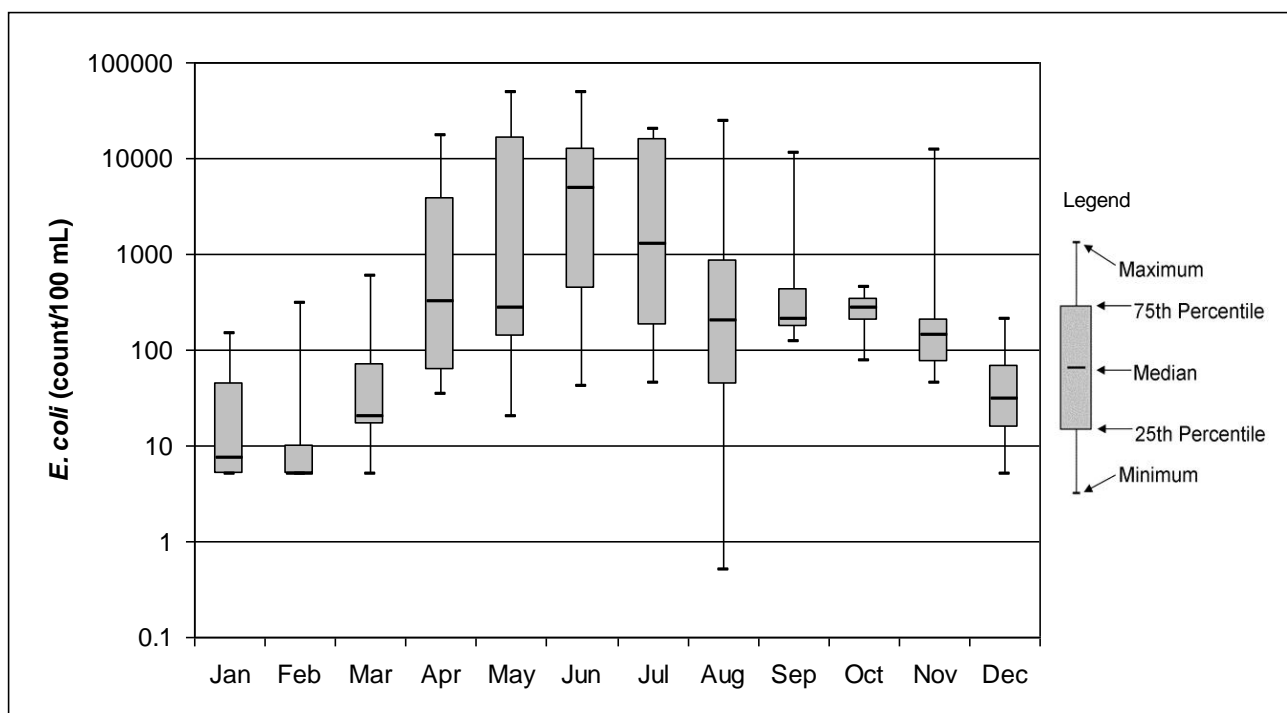


Figure 10. Monthly *E. coli* data for WBID 0421, 2001-2010

3 Source Inventory and Assessment

The source inventory and assessment characterizes known, suspected and potential sources of pollutant loading to the impaired water body. Pollutant sources identified within the watershed are categorized and quantified to the extent that information is available. Sources of pollutants may be point (regulated) or nonpoint (unregulated) in nature.

3.1 Point Sources

Point sources are defined under Section 502(14) of the federal Clean Water Act as any discernible, confined and discrete conveyance, such as a pipe, ditch, channel, tunnel or conduit, by which pollutants are transported to a water body. Point sources in Missouri are regulated through the Missouri State Operating Permit program⁸ and include industrial, domestic and municipal wastewater treatment facilities, and combined sewer overflow outfalls. By law, point sources also include concentrated animal feeding operations, or CAFOs, stormwater runoff from construction and industrial sites, illicit straight pipe discharges, and stormwater discharges from municipal separate storm sewer systems; or MS4s. Point sources in Kansas are regulated by the Kansas Department of Health and Environment and are presented in this document for informational purposes. The locations of each outfall for the permitted point sources in both Missouri and Kansas, including land area regulated under MS4 permits, are shown in Figure 11.

⁸ The Missouri State Operating Permit program is Missouri's program for administering the federal National Pollutant Discharge Elimination System program.

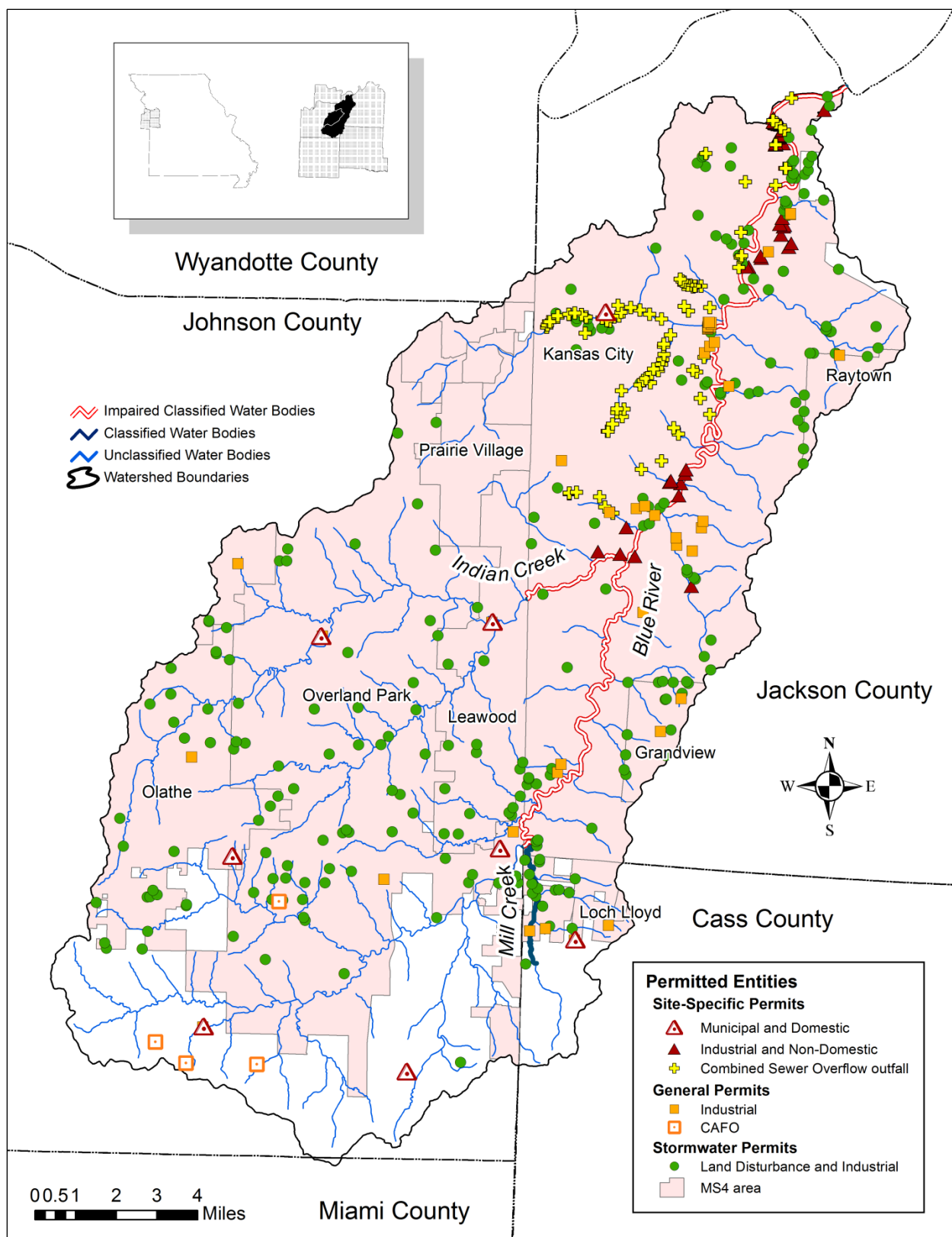


Figure 11. Permitted point sources in the Blue River and Indian Creek watersheds

At the time of this writing, the Missouri portion of the Blue River watershed contains 11 permitted entities holding site-specific permits and 119 entities holding general or stormwater permits. The site-specific permitted facilities in the Missouri portion of the Blue River and Indian Creek watersheds are listed in Table 9, and the general and stormwater permits are summarized by category in Table 10. A full list of general and stormwater permits in Missouri can be found in Appendix B. There are no permitted CAFOs in the Missouri side of these watersheds, but there are a number of designated MS4 stormwater permits, and one MS4 site-specific permit. Designated as Metropolitan No-Discharge Streams, no water contaminant except uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypass discharges not interfering with beneficial uses, may be discharged into either the Blue River or Indian Creek watersheds in Missouri.⁹ The one exception to this rule is for the allowance of certain discharges from combined sewer overflows into portions of Blue River.

In the Kansas portion of the Blue River watershed there are four permitted livestock facilities, 16 permitted entities holding site-specific permits, including five municipal or domestic wastewater facilities, and 147 entities holding general or stormwater permits. The site-specific permitted facilities in the Kansas portion of the Blue River and Indian Creek watersheds are listed in Table 11, and the livestock facilities are listed in Table 12. A full list of Kansas general and stormwater permits can be found in Appendix B. It should be noted that expiration dates for these permits were not available and some of these permits may no longer be active. The Department assumes that activities associated with permitted facilities in the Kansas side of the watershed are conducted in compliance with all permit conditions, including monitoring and discharge limitations. It is expected that compliance with these permits will result in bacterial loadings at or below applicable targets.

Table 9. Missouri site-specific permitted facilities in the Blue River and Indian Creek watersheds

Permit No.	Facility Name	Receiving Stream	Design Flow (MGD)	Permit Expiration Date
MO-0004863	U.S. Dept. of Energy, Kansas City Plant	Indian Creek and Blue River	5.38 (Stormwater)	11/2/2004
MO-0004952	AK Steel Corporation	Blue River	Stormwater	2/10/2015
MO-0024911	Kansas City Blue River WWTP	Missouri River	105 ¹⁰	11/15/2016
MO-0111180	Sanofi-Aventis	Tributary to Blue River	429.8 (Stormwater)	8/20/2014
MO-0115801	Advantage Metals Recycling, LLC	Ditch to Blue River	Stormwater	05/19/2016
MO-0117692	Waste Express, Inc.	Tributary to Blue River	Stormwater	6/1/2011

⁹ 10 CSR 20-7.031(6) and Table F

¹⁰ Entire design flow discharges to the Missouri River

Permit No.	Facility Name	Receiving Stream	Design Flow (MGD)	Permit Expiration Date
MO-0118214	Sneads Bar-B-Q	Tributary to Mill Creek	0.0016	12/22/2014
MO-0120294	Former Koppers Facility	Tributary to Blue River	120 (Stormwater)	10/22/2014
MO-0123790	Centropolis Landfill	Tributary to Blue River	4.66 (Stormwater)	8/13/2014
MO-0127787	MDC Discovery Center	Brush Creek	0.0024	10/11/2012
MO-0130516	Kansas City MS4	Tributary to Blue River	Stormwater	9/2/2009

Table 10. Categories of Missouri general and stormwater permits in the Blue River and Indian Creek watersheds¹¹

Permit #	Description	Total
MO-G49xx	Limestone Quarries	17
MO-G69xx	Dredging Lakes/Rivers Harbors	1
MO-G76xx	Swimming Pool Discharges	1
MO-G97xx	Yard Waste Compost Sites	3
MO-R04xx	Small MS4s	3
MO-R104xx	Land Disturbance > 5 Acres	1
MO-R105xx	Land Disturbance > 5 Acres	2
MO-R109xx	Land Disturbance in Designated Acres	6
MO-R10xx	Land Disturbance > 1 Acre	33
MO-R13xx	Textile and Apparel/Printing and Publishing	3
MO-R203	Fabricated Metal, Light Industrial	8
MO-R23D	Plastics and Rubber Manufacturing	2
MO-R60A	Motor Vehicle Salvage	17
MO-R80C	Motor Freight Transportation	5
MO-R80H	Solid Waste Transfer	2
MO-RA	Construction or Land Disturbance	15
	Total	119

¹¹ Descriptions of general and stormwater permit categories can be found on the Department's website at: <http://dnr.mo.gov/env/wpp/permits/index.html>

Table 11. Kansas site-specific permitted facilities in the Blue River and Indian Creek watersheds

Permit No.	Facility Name	Receiving Stream	Design Flow (MGD)	Permit Expiration Date
I-MO26-PO03	Stanley West Quarry	Tributary to Coffee Creek	Stormwater	10/31/2013
I-MO26-PO03	East Stanley Site	Tributary to Blue River	Stormwater	3/31/2012
I-MO28-PR01	Clarkson Construction – Plant Rex 6209	Indian Creek	Stormwater	9/30/2012
M-MO14-NO05	Johnson County Executive Airport	NA	No Discharge	10/31/2014
M-MO14-OO03	Timber Wolf Estates WWTP	Tributary to Wolf Creek	0.019	3/31/2013
M-MO26-OO03	Stilwell Elementary School WWTP	Camp Branch	0.035	6/30/2013
M-MO26-OO06	Blue River Main Sewer District No. 1	Negro Creek	10.5	12/31/2011
M-MO27-OO01	Tomahawk Creek M.S.D. No. 1 WWTP	Indian Creek	10	12/31/2009
M-MO28-OO01	Johnson County Smith Middle Basin WWTP	Indian Creek	12	12/31/2009
M-MO27-SU01	City of Leawood MS4	Unknown	Stormwater	9/30/2009
M-MO28-SU01	City of Overland Park MS4	Unknown	Stormwater	9/30/2009
M-MO34-SU01	City of Fairway MS4	Unknown	Stormwater	9/30/2009
M-MO35-SU01	City of Roeland Park MS4	Unknown	Stormwater	9/30/2009
M-MO36-SU01	City of Westwood MS4	Unknown	Stormwater	9/30/2009
M-MO37-SU01	City of Mission Hills MS4	Unknown	Stormwater	9/30/2009
M-MO38-SU01	City of Prairie Village MS4	Unknown	Stormwater	9/30/2009

Table 12. Kansas livestock facilities in the Blue River and Indian Creek watersheds

<i>Active Livestock Permits</i>		
Permit Number	Type	Animal Units ¹²
A-MOJO-L001	Sheep/horses	242
<i>Active Livestock Certificates</i>		
Certificate Number	Type	Animal Units
A-MCJO-BA10	Beef	290
A-MOJO-BA01	Beef	412.5
A-MOJO-MA03	Dairy	98

¹² As defined in Kansas statute KSA 65-171d(c)(3).

3.1.1 Municipal and Domestic Wastewater Permits

Municipal and domestic wastewater treatment facilities are designed to treat household waste, including both gray water and sewage. These treatment facilities can be potential sources of bacteria, particularly when malfunctions, vandalism, mismanagement, or excessive storm flows cause untreated sewage to discharge into a receiving water body. There are only two domestic wastewater treatment facilities that discharge within the Missouri portion of the Blue River watershed. One is a lagoon system associated with Sneads Bar-B-Q (MO-0118214) that discharges to a tributary to Blue River. It is a very small system with a very low design flow and, as such, it is not expected to be a significant contributor of bacteria to the watershed. The other domestic facility, the Missouri Department of Conservation Discovery Center (MO-0127787), treats a portion of its wastewater onsite with a wetland system, and discharges the rest to the Kansas City, Mo. municipal wastewater treatment system. As a result, the Discovery Center is not expected to be a source of bacteria to Blue River or any of its tributaries.

The sole municipal wastewater treatment plant affecting the Missouri side of the Blue River watershed is the Kansas City Blue River Wastewater Treatment Facility. This facility is one of seven such facilities operated by the Kansas City Water Services Department, and is the city's largest, with a maximum permitted design flow of 105 million gallons per day. Treated effluent from this facility is not discharged to the Blue River, but is instead discharged through a primary outfall directly to the Missouri River. Although the treatment facility is located outside of the Blue River watershed and discharges outside of the watershed, this facility and the urban area within the watershed includes areas serviced by a separate sanitary sewer system, as well as areas serviced by a combined sewer system. In addition to serving residents and businesses within the corporate city limits, the separate sanitary sewer system also serves a number of satellite communities, most significantly the Johnson County, Kan. Wastewater District, with a population of approximately 127,000 people.

A sanitary sewer system is a municipal wastewater collection system designed to convey domestic, commercial and industrial wastewater to a municipal wastewater treatment facility. This system can include limited amounts of inflow and infiltration from groundwater and storm water, but it is not designed to collect large amounts of runoff from precipitation events. Untreated or partially treated discharge from a sanitary sewer system is generally referred to as a sanitary sewer overflow, and can include overflows out of manholes, or backups into private residences. Such discharges are unpermitted and are not authorized by the federal Clean Water Act. They can occur as a result of vandalism, power failures, lapses in sewer system operation and maintenance, or excessive inflow and infiltration. It is estimated that about half of the annual flow within the Kansas City sewer system is attributable to inflow and infiltration during wet weather events, and that peak flows during heavy rainfall can be up to ten times the average daily flow during dry weather (Kansas City 2009). While there are no constructed sanitary sewer overflows within the Blue River watershed, unintended discharges do occur and can result in elevated bacteria concentrations to the receiving streams. One such occurrence of an accidental overflow, attributed to a debris blockage, occurred on April 13, 2011 and resulted in an estimated discharge of 1 gallon per minute into an unnamed tributary to Blue River (Kansas City Infozone 2011). In addition, it is estimated that within two Blue River subbasins that were studied as part of Kansas City's Overflow Control Plan, a 5-year, 24-hour rainfall event may result in a

discharge of almost 69 million gallons of untreated wastewater and stormwater from sanitary sewer overflows (Kansas City 2009). For this reason, sanitary sewer overflows are considered to be potentially significant contributors of *E. coli* to Blue River and Indian Creek.

The other type of sewer system in the Blue River watershed is a combined sewer system. Combined sewer systems are designed to collect rainwater runoff, domestic sewage, and industrial wastewater in the same pipe and transport it to a wastewater treatment plant, where it is treated and then discharged. During periods of heavy precipitation, however, the wastewater volume in a combined sewer system can exceed the capacity of the sewer system or treatment plant. For this reason, combined sewer systems are designed to overflow occasionally and discharge excess wastewater directly to nearby streams or rivers. These discharges, called combined sewer overflows, contain not only stormwater runoff but also untreated human and industrial waste, including potentially high levels of bacteria. There are approximately 87 identified combined sewer outfalls in the Missouri side of the Blue River watershed (Figure 11 and Appendix C) with a total estimated annual overflow volume of 2.8 billion gallons, and an average overflow frequency of at least 18 times per year per combined sewer outfall (Kansas City 2009). For this reason, combined sewer overflows are considered to be potentially significant contributors of *E. coli* to Blue River. There are no combined sewer outfalls in the Indian Creek subwatershed.

Like all wastewater treatment plants in Missouri, the Kansas City Blue River Wastewater Treatment Facility must meet the requirements of an operating permit issued by the Department. This permit contains discharge limits that this facility must meet to be protective of in-stream water quality standards. Previous operating permits in Missouri authorized discharges of bypassed wastewater at some facilities during peak flow conditions. These facility discharges from treatment plant outfalls (not to be confused with combined sewer overflows) were required to meet effluent limitations, but these limitations were not as stringent as those for the main facility discharge. Changes to Department regulations have removed this authorization, and permits are now issued without bypass discharges being authorized. Discharges resulting from emergency diversion shall be considered an unauthorized bypass pursuant to 40 CFR 122.41(m) and shall be reported, pursuant to 40 CFR 122.41(m)(3)(ii).

The current site-specific operating permit for the Kansas City Blue River Wastewater Treatment Facility was renewed on Nov. 16, 2011 and expires on Nov. 15, 2016. In addition to revising effluent limits for the main facility outfall, including establishing *E. coli* limits, the new permit includes a number of other significant changes, some of which are driven by the consent decree settlement and the establishment of the city's Overflow Control Plan. These changes include, among other things, a mandate that the permittee shall develop and implement a Storm Water Pollution Prevention Plan, as well as develop and implement a program for the maintenance and repair of the collection system to address both sanitary and combined sewer overflows. The revised permit also includes the Department's approval of Kansas City's development of a Sewer Extension Authority, as well as an acknowledgement of the city's Overflow Control Plan for the control of combined sewer overflows. This acknowledgement is coupled with a requirement that the permittee shall submit an annual report to the Department on the previous year's efforts to implement the Plan.

3.1.2 Industrial and Non-Domestic Wastewater Permits

There are no facilities in the Blue River and Indian Creek watersheds discharging industrial and non-domestic wastewater. Industrial and non-domestic facilities within these watersheds are permitted to discharge only stormwater. For these reasons, industrial and non-domestic facilities are not expected to cause or significantly contribute to the bacteria impairment of either Blue River or Indian Creek.

3.1.3 Municipal Separate Storm Sewer System Permits

As noted in Tables 9 – 11, as well as Appendix B, there are a number of MS4 permits in the Blue River and Indian Creek watersheds. This includes one site-specific MS4 permit for the city of Kansas City, Mo., as well as three general stormwater MS4 permits in Missouri and seven stormwater MS4 permits in Kansas covering the communities in the Kansas City metropolitan area. The communities with general stormwater permits on the Missouri side of the watershed include Grandview, Raytown and Belton. This type of permit addresses pollutant contributions from urban runoff. Urban runoff has been found to carry high levels of bacteria and can be expected to exceed water quality criteria for bacteria during and immediately after storm events in most streams throughout the country (EPA 1983). Common sources of *E. coli* contamination in urban stormwater have been documented as being from both wild and domestic animals (Burton and Pitt 2002). Bacterial inputs to streams from urban runoff can be caused by sanitary sewer overflows as discussed in Section 3.1.1, but also commonly results from residential and green space runoff carrying domestic and wild animal wastes. A USGS study examining the effects of wastewater and combined sewer overflows on water quality in the Blue River watershed concluded that contributions of *E. coli* bacteria were roughly equally divided between dog, geese, human, and unknown sources. Leaking sewer lines, discharges from wastewater treatment plants and combined sewer overflows are likely to be the dominant sources of human derived *E. coli* in Blue River (USGS 2010). However, as noted above, bacteria from other animal sources can enter streams as contaminated runoff from urban areas, either directly or through storm sewer discharge. Therefore, urban runoff is a significant potential contributor of bacteria to Blue River and Indian Creek.

In the case of Blue River and Indian Creek, MS4 permits regulate almost all urban stormwater discharges for the watershed area. Approximately 84 percent of the entire watershed, and 94 percent of the watershed in Missouri, falls under MS4 regulation. This includes nearly 100 percent of both the Indian Creek watershed in Missouri and the entire Indian Creek watershed under MS4 control. All designated municipal areas in Missouri, with the exception of 1.9 square miles constituting The Village of Loch Lloyd, are covered by MS4 permits, and a review of land cover and aerial imagery indicates that very little land area outside of the municipal boundaries can be characterized as urban. For this reason, urban stormwater runoff is considered an MS4-regulated point source for this TMDL.

Although stormwater discharges are untreated, MS4 permit holders must develop, implement, and enforce stormwater management plans to prevent the input of harmful pollutants. These plans must include measurable goals, must be reported on annually, and must meet six minimum control measures. These six minimum control measures are public education and outreach,

public participation and involvement, illicit discharge detection and elimination, construction site runoff control, post-construction runoff control, and pollution prevention.

3.1.4 Other General and Stormwater Permits

In addition to site-specific permits and stormwater MS4 permits, there are a number of other facilities with general and stormwater permits within the Blue River and Indian Creek watersheds in Missouri, as outlined in Table 10 and Appendix B. General permits are issued to activities that are similar enough to be covered by a single set of requirements. Stormwater permits are issued to activities (e.g., land disturbance) that are similar enough to be covered by a single set of requirements and are expected to discharge in response to storm events. Both general and stormwater permits are meant to be flexible enough to allow for ease and speed of issuance while providing the required protection of water quality.

As noted previously, there are no permitted CAFOs within the Missouri side of the Blue River watershed. However, animal feeding operations where animals are maintained or fed under confined conditions but which maintain fewer than 300 animal units are not legally defined as CAFOs under Missouri state regulations. Additionally, facilities that are defined as CAFOs but which maintain fewer than 1,000 animal units are not required to obtain a Missouri State Operating Permit. Since these operations are not regulated by the Department there is no data available on their numbers or locations, but given that the Missouri portion of this watershed is almost entirely urban, it is unlikely that discharges from such facilities are a source of bacteria in either Blue River or Indian Creek.

The Department assumes that activities associated with general and stormwater permits in the watershed will be conducted in compliance with all permit conditions, including monitoring and discharge limitations. It is expected that compliance with these permits will result in bacterial loadings at or below applicable targets. For these reasons, these facilities are not expected to cause or contribute to the bacterial impairment of Blue River and Indian Creek.

3.1.5 Illicit Straight Pipe Discharges

Illicit straight pipe discharges of household waste are also potential point sources of bacteria. These sources are illegal and unpermitted discharges straight into streams or land areas and are different from illicitly connected sewers. However, there are no specific data on the number or presence of illicit straight pipe discharges of household waste in the Blue River and Indian Creek watersheds. Due to the presence of a sewerage system throughout the majority of the watershed, illicit straight pipe discharges are not expected to be significant contributors of *E. coli* to Blue River and Indian Creek. Illicit discharge detection and elimination is one of the six minimum control measures required by an MS4 permit, and any straight pipe discharges should be addressed under local codes and ordinances, and by the stormwater management plan, as applicable.

3.2 Nonpoint Sources

Nonpoint source pollution refers to pollution coming from diffuse, non-permitted sources that typically cannot be identified as entering a water body at a single location. They include all other categories of pollution not classified as being from a point source, and are exempt from Department permit regulations as per state rules at 10 CSR 20-6.010(1)(B)1. These sources involve stormwater runoff from non-regulated areas and are minor or negligible under low-flow conditions. Typical nonpoint sources of pollution that have the potential to influence water quality include onsite wastewater treatment systems, various sources associated with runoff from agricultural and non-MS4 permitted urban areas, and riparian corridor conditions.

3.2.1 Agricultural Runoff

Stormwater runoff from lands used for agricultural purposes is often a source of bacterial loading to water bodies. Activities associated with agricultural land uses that may contribute bacteria to a water body include manure fertilization of croplands or pastures, and livestock grazing. However, as noted in Section 2.5, row crop agriculture accounts for only 5.3 percent of the land use within the Missouri portion of the Blue River watershed, and 5.6 percent of the land use in the Blue River watershed as a whole. Similarly, land use classified as grassland, which may be used for livestock grazing, accounts for 11 percent of the watershed area in Missouri, and 17 percent of the entire watershed. This land use is concentrated primarily in the very southern edge of the watershed, in the headwaters and tributaries far from the main stem of Blue River (see Figure 4). In addition, a review of recent aerial imagery from the watershed has indicated that, consistent with the predominantly urban nature of the watershed, some of the areas classified as agricultural land are actually parks, cemeteries, athletic fields, or disturbed open spaces. So while agricultural runoff may potentially be a source of bacteria to Blue River, it is expected to be a minor source, given the relative insignificance of agricultural land use within the watershed and the potential for bacterial die-off before such runoff actually reaches Blue River. Having said that, open green spaces within urban watersheds may still contribute bacteria via stormwater runoff contaminated by wildlife and domestic pet waste, as noted in Section 3.1.3.

While the Blue River watershed is predominantly urban, the Indian Creek watershed may effectively be characterized as entirely urban. Row crop agriculture accounts for only 0.6 percent of the land use within the Missouri portion of the Indian Creek watershed, and 0.3 percent of the land use in the Indian Creek watershed as a whole. Similarly, land use classified as grassland accounts for 2.6 percent of the watershed area in Missouri, and only 0.8 percent of the entire watershed. As in the Blue River watershed, recent aerial imagery indicates that these areas are also actually parks, cemeteries, athletic fields, and other features of an urban landscape, a finding corroborated by the fact that these areas are surrounded by land use classified as urban.

3.2.2 Urban Runoff (non-MS4 areas)

Stormwater runoff from urban areas not having MS4 permits is considered a nonpoint source. Although previous Missouri 303(d) Lists cite urban nonpoint sources as the cause of the bacteria

impairments in Blue River and Indian Creek, almost the entire urban area within these watersheds falls within the jurisdiction of a number of MS4 permits in both Missouri and Kansas. Therefore, for the purposes of this TMDL, urban runoff within the Blue River and Indian Creek watersheds is considered a potential point source contributor of *E. coli*, rather than a nonpoint source. For this reason, there are essentially no nonpoint urban runoff sources likely to be contributing to the bacteria impairments of Blue River and Indian Creek. See Section 3.1.3 for discussion pertaining to the MS4 permits.

3.2.3 Onsite Wastewater Treatment Systems

When properly designed and maintained, onsite wastewater treatment systems (e.g., home septic systems) should not serve as a source of contamination to surface waters; however, onsite wastewater treatment systems do fail for a variety of reasons. When these systems fail hydraulically (surface breakouts) or hydrogeologically (inadequate soil filtration), there can be adverse effects to surface water quality (Horsley and Witten 1996). Failing onsite wastewater treatment systems are known to be sources of bacteria, which can reach nearby streams through both surface runoff and groundwater flows, thereby contributing bacteria loads under either wet or dry weather conditions.

Onsite wastewater treatment systems in Jackson County, Mo. have been permitted by the county Public Works Department since 1985. This includes systems that have been installed, repaired or replaced since that time, but does not include systems that were installed or last modified before then. This also does not include systems within the Kansas City corporate limits, where the county Public Works Department has no jurisdiction (Steve Schnell, Jackson County Public Works, personal communication, Nov. 2, 2011). While data is not available at this time to estimate the number of existing systems in Jackson County outside of the Kansas City limits, the proportion of unincorporated area within the Blue River watershed is relatively small. However, the Kansas City Water Services Department does maintain a geospatial database identifying the locations of known and suspected onsite systems within the city limits. From this database, the number of onsite wastewater treatment systems on the Missouri side of the Blue River watershed (excluding Indian Creek) is estimated at 2,851, and the number of such onsite systems on the Missouri side of the Indian Creek watershed is 108 (Kansas City 2011).

Onsite wastewater treatment systems in Johnson County, Kan. have been regulated and permitted by the Johnson County Environmental Department since the 1960's, and the county maintains a record of all systems that have been installed, inspected or repaired since that time (Charlene Weiss, Johnson County Environmental Department, personal communication, Nov. 1, 2011). The locations of these onsite systems is maintained in a geospatial database by the Johnson County Automated Information Mapping System. From this database, the number of known, permitted onsite wastewater treatment systems on the Kansas side of the Blue River watershed (excluding Indian Creek) is estimated at 2,590, and the number of such onsite systems on the Kansas side of the Indian Creek watershed is 246 (Johnson County Environmental Department 2011a and Travis Wagner, Johnson County Automated Information Mapping System, email communication, Nov. 1, 2011). The actual number of systems may be as much as 18 percent greater in the Blue River watershed and 74 percent greater in the Indian Creek watershed, when

taking in consideration the number of non-permitted onsite systems estimated to be in these watersheds (Johnson County Environmental Department 2011b).

A study conducted by the Electric Power Research Institute suggests that 30 to 50 percent of onsite wastewater treatment systems in Missouri may be failing, and that in Kansas the failure rate may be 10 to 75 percent, depending upon the age of the system (EPRI 2000). These failure rates, combined with estimates of existing onsite systems, suggest that failing systems may potentially be a significant source of bacteria to Blue River and Indian Creek. It should be emphasized, however, that these suspected failure rates are sometimes based on unconfirmed estimates and other general information, and are not specific to this watershed. Therefore, it is not possible to accurately assess the degree to which these systems are truly contributing to the bacteria impairment of Blue River and Indian Creek.

3.2.4 Riparian Corridor Conditions

Riparian (streamside) corridor conditions can have a strong influence on instream water quality. Wooded riparian buffers are a vital functional component of stream ecosystems and are instrumental in the detention, removal and assimilation of pollutants from runoff. Therefore, a stream with good riparian cover is better able to moderate the impacts of high pollutant loads than a stream with poor, or no, riparian cover. However, with respect to bacteria, vegetated areas may be considered a source due to inputs from pets and wildlife and may, in fact, contribute to the impairment in Blue River and Indian Creek.

Table 13 presents land use data for the riparian corridor within the Blue River watershed. This analysis used the land use data calculated in Section 2.5 and defined the riparian corridor as a 30-meter area on each side of all streams within the watershed included in the National Hydrography Dataset 1: 24,000 scale flowline.¹³ As can be seen in Table 13, the riparian corridor of Blue River can be characterized as predominantly urban, with forest and grassland comprising the majority of other land uses. As noted previously, it is likely that many of the areas classified as forest and grassland are actually features of a more urban landscape such as parks, cemeteries, athletic fields. Runoff from these areas, like runoff from impervious and residential areas, is likely to be a source of bacteria from pet waste and from wildlife that tend to concentrate in urban areas, such as geese. Having said that, it should be noted that approximately 78 percent of the riparian buffer within the Blue River watershed, whether classified as urban, forest or grassland, is regulated under MS4 permits, therefore making stormwater runoff from these areas a regulated point source (see Section 3.1.3). While rural, agricultural areas potentially contributing bacteria from wildlife and livestock activities do exist, these are not a significant part of the watershed and are not considered to be a significant source of bacteria.

¹³ The National Hydrography Dataset is digital surface water data for geographic information systems (GIS) for use in general mapping and in the analysis of surface-water systems. Available URL: <http://nhd.usgs.gov>

Table 13. Land use/land cover for the Blue River riparian buffer, 30-meter (MoRAP 2005 and KARS 2008).

Land Use/ Land Cover	Missouri			Kansas			Entire Watershed		
	Watershed Area			Watershed Area			Watershed Area		
	Acres	Square Miles	Percent	Acres	Square Miles	Percent	Acres	Square Miles	Percent
Urban	1666	2.6	38.8	4674	7.3	54.9	6339	9.9	49.5
Cropland	175	0.3	4.1	221	0.3	2.6	396	0.6	3.1
Grassland	459	0.7	10.7	1823	2.8	21.4	2281	3.6	17.8
Forest/Woodland	1444	2.3	33.6	1591	2.5	18.7	3035	4.7	23.7
Open Water	180	0.3	4.2	199	0.3	2.3	380	0.6	3.0
Barren	0	0.0	0.0	5	0.0	0.1	5	0.0	0.0
Herbaceous	45	0.1	1.0	ND	ND	ND	45	0.1	0.4
Wetland	326	0.5	7.6	ND	ND	ND	326	0.5	2.5
Total	4295	6.8	100	8513	13.2	100	12807	20.0	100

Note: MoRAP = Missouri Resource Assessment Partnership

KARS = Kansas Applied Remote Sensing Program

ND = No Data. At the time of this TMDL, data were not available to estimate area of herbaceous and wetland land cover in Kansas.

4 Applicable Water Quality Standards and Numeric Water Quality Targets

The purpose of developing a TMDL is to identify the pollutant loading that a water body can receive and still achieve water quality standards. Water quality standards are therefore central to the TMDL development process. Under the federal Clean Water Act, every state must adopt water quality standards to protect, maintain, and improve the quality of the nation's surface waters (U.S Code Title 33, Chapter 26, Subchapter III (U.S. Code 2009)). Water quality standards consist of three components: designated beneficial uses, water quality criteria to protect those uses, and an antidegradation policy.

4.1 Designated Beneficial Uses

Designated beneficial uses are the uses for a water body identified in the state water quality standards that must be maintained in accordance with the federal Clean Water Act. The following designated beneficial uses have been assigned to Blue River and Indian Creek:

- Livestock and Wildlife Watering
- Protection of Warm Water Aquatic Life
- Protection of Human Health (Fish Consumption)
- Whole Body Contact Recreation – Category A (0419 and 0420)
- Whole Body Contact Recreation – Category B (0417, 0418 and 0421)
- Secondary Contact Recreation (0418, 0419 and 0421)
- Industrial (0417, 0418 and 0420)

The use impaired by bacteria in this stream is the protection of whole body contact recreation, categories A and B, and secondary contact recreation. Whole body contact recreation includes activities in which there is direct human contact with surface water that results in complete body submergence, thereby allowing accidental ingestion of the water as well as direct contact to sensitive body organs, such as the eyes, ears and nose. Category A waters include water bodies that have been designated as public swimming areas and waters with existing whole body contact recreational uses. Category B applies to waters designated for whole body contact recreation, but are not contained within category A. Secondary contact recreation includes activities where contact with the water is either accidental or incidental and the likelihood of ingesting large quantities of water is minimal. The designated uses and stream classifications for Missouri may be found in the Water Quality Standards at 10 CSR 20-7.031(1)(C),-(1)(F) and Table H (Missouri Secretary of State 2010).

4.2 Water Quality Criteria

Water quality criteria are limits on particular chemicals or conditions in a water body to protect particular designated beneficial uses. Water quality criteria can be expressed as specific numeric criteria or as general narrative statements.

Specific numeric criteria established for the protection of whole body and secondary contact recreation can be found in Missouri's Water Quality Standards at 10 CSR 20-7.031(4)(C). For whole body contact category A waters, *E. coli* counts, measured as a geometric mean during the recreational season (April 1 – October 31), shall not exceed 126 counts/100 mL of water. For category B waters, the geometric mean during the recreational season shall not exceed 206 counts/100 mL of water. For waters designated for secondary contact recreation, the *E. coli* geometric mean during the recreational season shall not exceed 1,134 counts/100 mL of water.

4.3 Antidegradation Policy

Missouri's water quality standards include EPA's "three-tiered" approach to antidegradation, which may be found at 10 CSR 20-7.031(2) (Missouri Secretary of State 2010).

Tier 1 – Protects existing uses and a level of water quality necessary to maintain and protect those uses. Tier 1 provides the absolute floor of water quality for all waters of the United States. Existing in-stream water uses are those uses that were attained on or after November 28, 1975, the date of EPA's first Water Quality Standards Regulation.

Tier 2 – Protects and maintains the existing level of water quality where it is better than applicable water quality criteria. Before water quality in Tier 2 waters can be lowered, there must be an antidegradation review consisting of: (1) a finding that it is necessary to accommodate important economic and social development in the area where the waters are located; (2) full satisfaction of all intergovernmental coordination and public participation provisions; and (3) assurance that the highest statutory and regulatory

requirements for point sources and best management practices for nonpoint sources are achieved. Furthermore, water quality may not be lowered to less than the level necessary to fully protect the “fishable/swimmable” uses and other existing uses.

Tier 3 – Protects the quality of outstanding national and state resource waters, such as waters of national and state parks, wildlife refuges, and exceptional recreational or ecological significance. There may be no new or increased discharges to these waters and no new or increased discharges to tributaries of these waters that would result in lower water quality.

Waters in which a pollutant is at, near or exceeds the water quality criteria are considered in Tier 1 status for that pollutant. Therefore, the antidegradation goals for Blue River and Indian Creek are to restore the streams’ water quality to levels that meet water quality standards.

4.4 Numeric Targets

Since Missouri’s Water Quality Standards include specific numeric *E. coli* water quality criteria for whole body contact recreation categories A and B designated uses, these values will serve as the numeric targets for TMDL development. Because these criteria are more restrictive than the criterion for secondary contact recreation, these targets will also be protective of the secondary contact recreation use. As noted in Section 4.1, the whole body contact recreation category A designated use is assigned to Indian Creek and Blue River segment 0419, and the whole body contact recreation category B designated use is assigned to Blue River segments 0417, 0418 and 0421. And as noted in Section 4.2, the specific numeric criterion for whole body contact recreation category A is a concentration of 126 *E. coli* counts per 100 mL of water measured as a geometric mean during the recreational season, and the criterion for category B waters is a concentration of 206 *E. coli* counts per 100 mL of water measured as a geometric mean during the recreational season. These targeted concentrations will be expressed as daily loads using a load duration curve approach. Achieving these targeted loads will also result in achieving the state’s whole body contact water quality criteria.

Given the number of impaired water body segments in the Blue River watershed, a discussion of water quality criteria in the TMDL development process should take into consideration the issue of downstream designated uses. Federal water quality standards regulation 40 CFR § 131.10(b) establishes that each state “shall ensure that its water quality standards provide for the attainment and maintenance of the water quality standards of downstream waters.” With one exception, the impaired water body segments in the Blue River watershed are assigned uses and criteria that are as protective, or more protective, as the criteria and uses assigned to downstream segments. The exception is water body segment 0419, with a more stringent whole body contact recreation category A criterion, downstream of water body segment 0421, assigned a category B criterion. Even so, there is no evidence to date to demonstrate that the criterion for segment 0421 is not protective of downstream uses. Rather, the impairment in segment 0419 is linked to the *exceedances* of established water quality criteria that occur in segment 0421 and throughout the river, which this TMDL is intended to address. Since the criterion for water body segment 0421 is currently established in Missouri’s water quality standards rules, this is the criterion that must

be used to establish TMDL allocations for this segment at this time. It is not the purview of this TMDL to revise existing water quality standards. In the event that future water quality monitoring in Blue River does demonstrate that water quality standards for water body segment 0421 are not protective of downstream standards, the Clean Water Act provides means to address this situation. EPA guidance established in its Water Quality Standards Handbook notes that the Act provides a mechanism for establishing new or revised water quality standards where needed. The Handbook also points out that Sections 401 and 402 of the Act establish that the National Pollutant Discharge Elimination System (NPDES) program set permit limits that are required to comply with applicable water quality standards, including those downstream (EPA 1994).

5 TMDL Development

5.1 Water Quality and Stream Flow Data

As noted in Section 2.6 of this document, bacterial water quality data for each of the five impaired segments were collected and analyzed by the USGS, EPA Region 7, and the Kansas Department of Health and Environment between 1998 and 2010. In addition to being used to assess impairments, this observed data is plotted with stream flow to compare against water quality targets throughout the range of flows. See Table 8 in Section 2.6 for a list of recreation season *E. coli* geometric means for each impaired segment, and see Appendix A for a list of all *E. coli* sample data.

Stream flow data for Blue River and Indian Creek were available from six USGS gaging stations, four on Blue River and two on Indian Creek, for the period of Jan. 1, 1990 through Oct. 7, 2010 (Appendix D, Table D.1).

5.2 Modeling Approach

For Blue River and Indian Creek, the load duration curve approach was used. When stream flow gage information is available, a load duration curve is useful in identifying and differentiating between storm-driven and steady-input sources. A load duration curve also identifies the maximum allowable daily pollutant load for any given day as a function of the flow occurring that day. The load duration approach may be used to assess critical conditions, to provide a visual representation of stream flow conditions under which bacteria criteria exceedances have occurred, and to quantify the level of reduction necessary to meet the surface water quality targets for bacteria in the stream (Cleland 2002; Cleland 2003).

The first step in developing a load duration curve is establishing a record of flow to be used, and developing a flow duration curve based on this record. A flow duration curve and a synthetic flow record of daily flow per square mile for Blue River and Indian Creek were developed using data from the six gaging stations within the Blue River watershed. Average daily flow per square mile from all of the stations was calculated for each day of record and multiplied by the area of each watershed for which load duration curves were to be developed. These include the entire Blue River watershed, the Indian Creek watershed, and the immediate subwatersheds

draining to each of the four individual Blue River water body segments. This results in an estimation of flow for each of the larger watersheds, as well as an estimation of flow that is contributed only by the drainage area adjacent to each individual segment. The flow estimated for each segment does not take into consideration flow contributed by upstream water body segments (and their watersheds), and eliminates the possibility of the same contributing flow being counted more than once for different water body segments. This approach was used to estimate average daily flow for each day during the period from Jan. 1, 1990 through Oct. 7, 2010,. Additional discussion of the methods used to develop the bacteria load duration curve is presented in Appendix D.

The load duration curve approach used in this TMDL to express geometric mean bacteria concentrations as daily loads is consistent with the Anacostia Ruling (*Friends of the Earth, Inc., et al v. EPA*, No 05-5010, April 25, 2006) and EPA guidance in response to this ruling. The November 15, 2006 EPA “daily loads” memo recommends that all TMDLs and associated pollutant allocations be expressed in terms of daily time increments, and suggests that there is flexibility in how these daily increments may be expressed. In particular, the memo indicates that where pollutant loads or water body flows are highly dynamic, it may be appropriate to use a load duration curve approach, provided that such an approach “identifies the allowable daily pollutant load for any given day as a function of the flow occurring on that day”. In addition, for targets that are expressed as a concentration of a pollutant, it may be appropriate to use a table or graph to express individual daily loads over a range of flows as a product of a water quality criterion multiplied by stream flow and a conversion factor (EPA 2006). The load duration curve approach satisfied both of these conditions. Subsequent EPA guidance detailing options for expressing daily loads in TMDLs confirms and elaborates upon the appropriateness of using the load duration curve approach for translating water quality criteria expressed as concentrations into daily loads (EPA 2007a).

6 Calculation of Loading Capacity

The loading capacity, or TMDL, is the maximum pollutant load that a water body can assimilate and still maintain water quality standards. It is equal to the sum of the wasteload allocation, attributable to point sources of pollutants, the load allocation, attributable to nonpoint sources of pollutants, and the margin of safety. Loading capacity can be expressed as the equation

$$LC = \sum WLA + \sum LA + MOS$$

where LC is the loading capacity, $\sum WLA$ is the sum of all wasteload allocations, $\sum LA$ is the sum of all load allocations, and MOS is the margin of safety.

The loading capacity is calculated by multiplying stream flow in cubic feet per second, or cfs, by the maximum allowable bacteria concentration (the water quality criterion) in counts per 100 mL of water. A conversion factor is used to convert the units (cfs and counts per 100 mL) to counts per day.

$$(streamflow, cfs)(maximum allowable pollutant concentration, counts/100mL)(conversion) = counts/day$$

According to 40 CFR § 130.2(i), TMDLs can be expressed in terms of mass per time, toxicity or other appropriate measures. For Blue River and Indian Creek, bacteria TMDLs (loads) are expressed as *E. coli* counts per day using a load duration curve. The load duration curves presented in Figures 12 through 17 represent the maximum daily loading capacity for Blue River at its outlet with the Missouri River, for Indian Creek at its outlet with Blue River, and for each individual Blue River water body segment. These were calculated using the geometric mean water quality criteria as a solid line over the range of flows associated with each watershed or subwatershed (see Figure 1 for impaired segments and their subwatershed boundaries). Bacteria measurements from Blue River and Indian Creek observed during the recreational season (Apr. – Oct.) are plotted as blue points for comparison with this TMDL curve. Geometric means of observed data within a specific flow category (i.e., high flows, moist conditions, etc.) are plotted as yellow triangles for comparison with the curve. Flow conditions presented in the following figures illustrate general base-flow and surface-runoff conditions consistent with EPA guidance on using load duration curves for TMDL development (EPA 2007b). These figures also illustrate that higher *E. coli* counts per day and exceedances of water quality criteria generally appear to be more common at higher flows, indicating that high flows may represent critical conditions for bacteria impairments in Blue River and Indian Creek. Individual bacteria measurements can be found in Appendix A and geometric means for all water bodies are summarized in Table 8 of Section 2.6. Tables presenting the TMDL loading capacities and TMDL allocations over a range of flows can be found in Section 7, below.

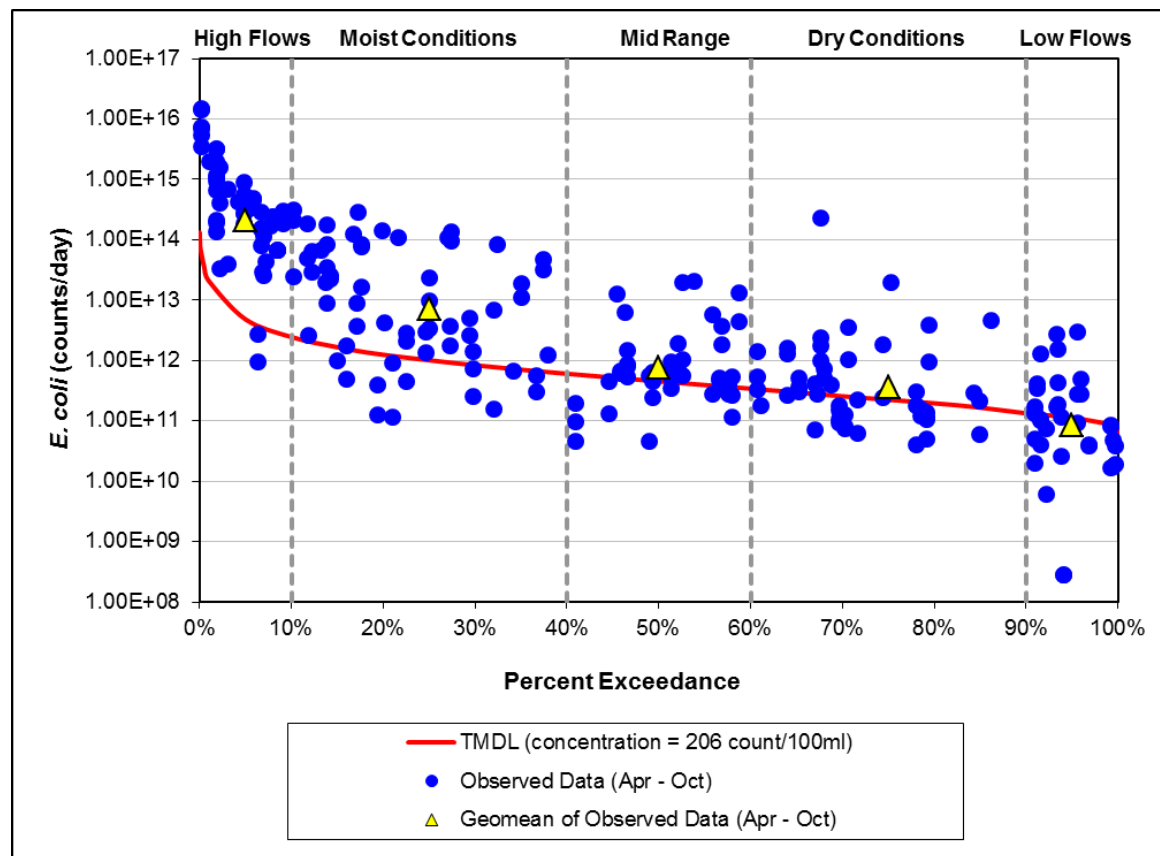


Figure 12. Blue River load duration curve (all segments in watershed)

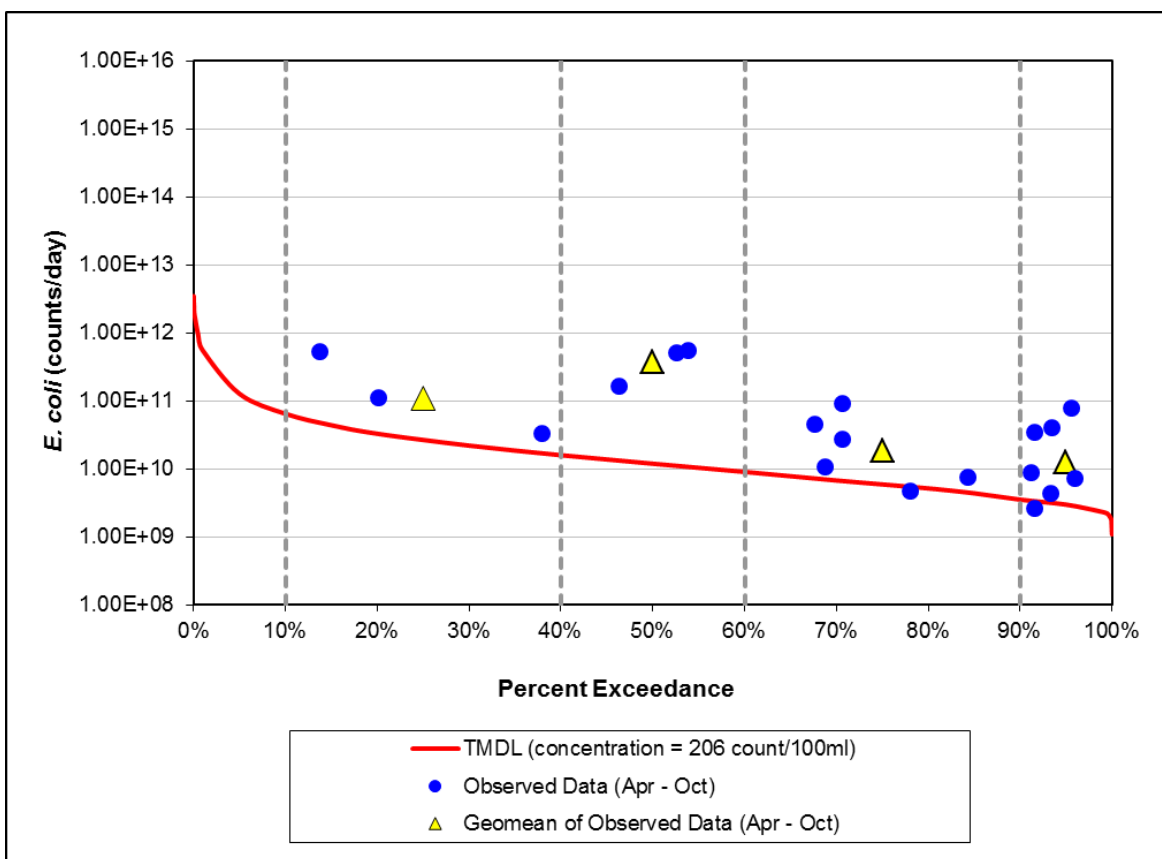


Figure 13. Blue River (segment WBID 0417) load duration curve

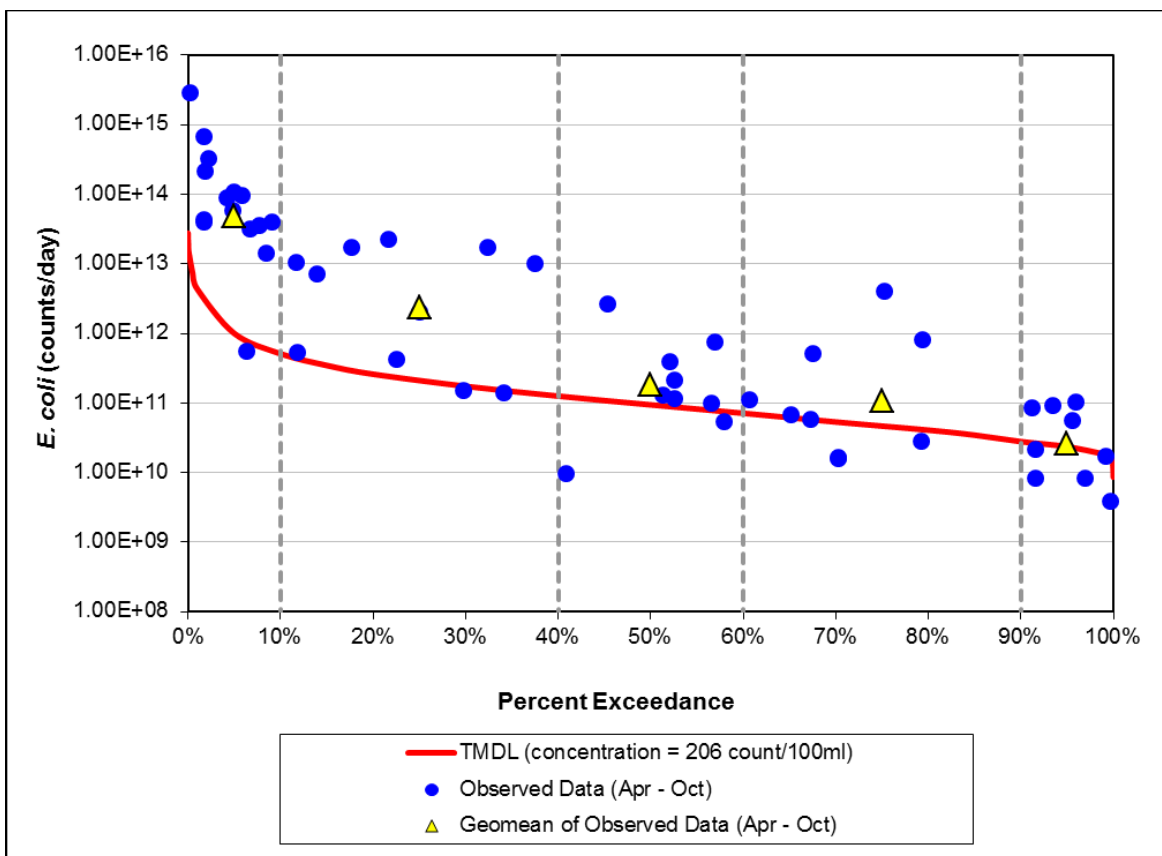


Figure 14. Blue River (segment WBID 0418) load duration curve

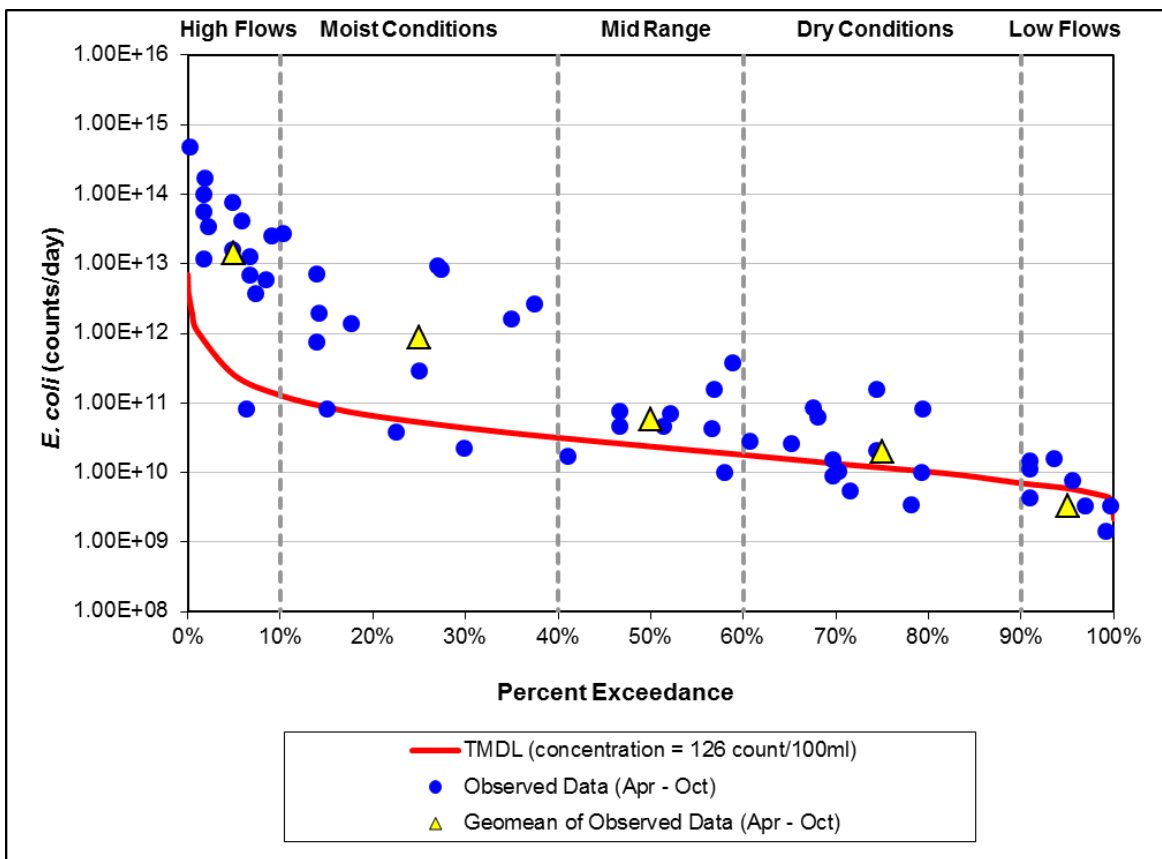


Figure 15. Blue River (segment WBID 0419) load duration curve

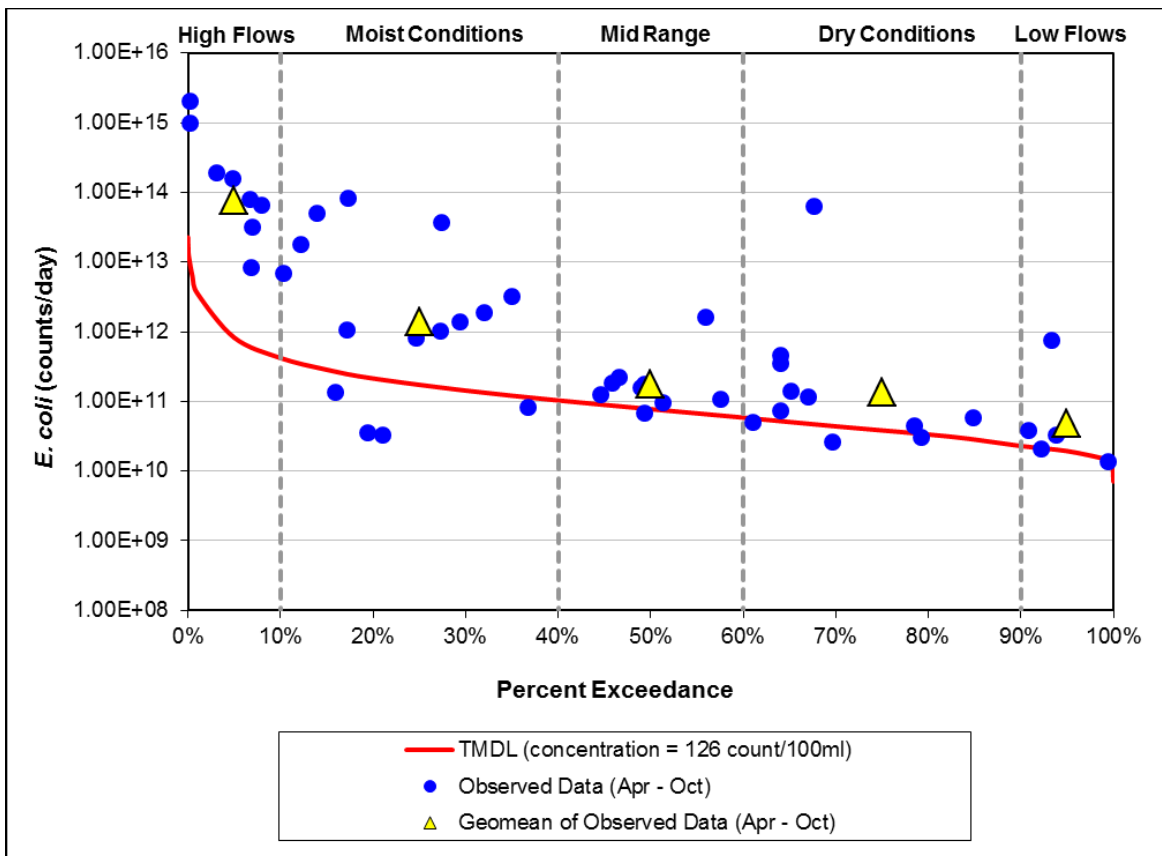


Figure 16. Indian Creek (WBID 0420) load duration curve

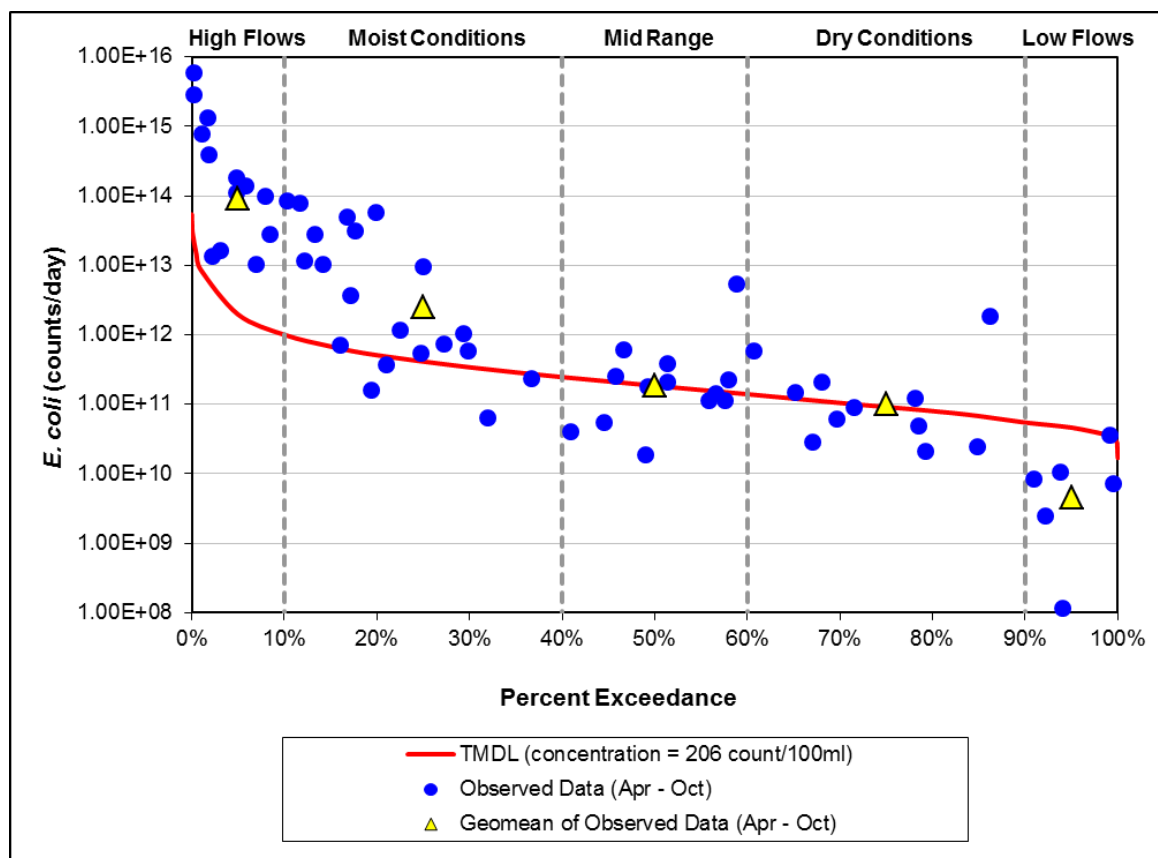


Figure 17. Blue River (segment WBID 0421) load duration curve

7 Wasteload Allocation (Point Source Load)

The wasteload allocation is the allowable amount of the pollutant that can be allocated to existing or future point sources. Typically, point sources are permitted with limits for a given pollutant that are the most stringent of either technology-based effluent limits or water quality-based effluent limits. Technology-based effluent limits are based upon the expected capability of a treatment method to reduce the pollutant to a certain concentration. Water quality-based effluent limits represent the most stringent concentration of a pollutant that a receiving stream can assimilate without violating applicable water quality criteria at a specific location. Tables 14 through 29 present the TMDL loading capacity and TMDL allocations over a range of flows for Blue River and Indian Creek at their outlets, as well as for each individual impaired segment of Blue River. These include tables that present the combined sewer overflow and MS4 wasteload allocation portion of each TMDL and, where applicable, include separate tables that present loading capacities and allocations for only the Missouri portion of each watershed. In addition to presenting pollutant allocations for the entire Blue River and Indian Creek watersheds, allocations are presented for the subwatersheds draining directly to each impaired segment (Figure 1). Allocations are calculated in this way to eliminate overlapping watersheds that have differing whole body contact recreation criteria, and that would otherwise result in assigning

multiple and conflicting MS4 wasteload allocations to each permitted municipal entity. It should be noted that because of the differing whole body contact recreation criteria among segments, the sum of the loading capacities and allocations for each segment at each flow are not equal to the loading capacities and allocations for the entire Blue River watershed at the corresponding flows.

Any TMDL allocations attributable to Kansas are presented for informational purposes only. In order to meet TMDL targets in Missouri, it must be assumed that point source contributions from the Kansas portion of the watershed do not cause or contribute to the impairments and that Missouri's water quality standards are met at the state line. This assumption is consistent with the federal water quality standards regulation, discussed in Section 4.4, that establish that a state's water quality standards must provide for the attainment and maintenance of water quality standards of downstream waters [40 CFR § 131.10(b)].

As noted in Sections 3.1.1 and 3.1.3, there are several site-specific permitted point sources in the Missouri portion of the Blue River watershed that have the potential to contribute to *E. coli* loading. Two of these, the Missouri Department of Conservation Discovery Center (impaired segment 0418) and Sneads Bar-B-Q (impaired segment 0421), have such low design flows that any bacteria contributions are expected to be insignificant. For this reason individual wasteload allocations have not been established for these facilities. Although the Kansas City Blue River Wastewater Treatment Facility discharges outside of the watershed, a sewerage system associated with this facility is present in the watershed. This system includes both sanitary sewers and combined sewers. Discharges from sanitary sewers are unpermitted and are not authorized by the federal Clean Water Act and, although sanitary sewer overflows do occur, there are no constructed sanitary sewer outfalls in the Blue River watershed. For these reasons, sanitary sewer overflows are not given a wasteload allocation in this TMDL. The elimination of sanitary sewer overflows to the greatest extent possible is essential for improving water quality in the Blue River watershed.

Unlike sanitary sewers, discharges from combined sewers are not specifically unauthorized by the Clean Water Act. However, EPA's 1994 Combined Sewer Overflow Control Policy establishes an approach for controlling discharges from combined sewer systems through the National Pollutant Discharge Elimination System in order to achieve compliance with water quality standards and to protect designated uses (Fed. Reg. 1994). Because of this, combined sewer overflows associated with the Kansas City Blue River Wastewater Treatment Facility are given wasteload allocations in this TMDL which were developed using numeric targets for projected end-of-plan overflow volumes established in Kansas City's Overflow Control Plan¹⁴. (See Appendix C for a list of known combined sewer outfalls in the Blue River watershed.) Pollutant allocations were calculated using the method outlined in Section 6, with flow defined by the projected overflow volumes established in the Plan according to Missouri's effluent regulations at 10 CSR 20-7.015. These regulations state that the permitting and control of combined sewer overflows shall conform to EPA's Combined Sewer Overflow Control Policy, which, by extension, includes the Overflow Control Plan. In this way, pollutant allocations assigned to combined sewer overflows in this TMDL document will be tied directly to projected end-of-plan overflow volumes and will not be more restrictive than what is already established

¹⁴ Section 12.6, Tables 12-4, 12-5, 12-7, 12-10 and 12-13 (Kansas City 2009).

by the Overflow Control Plan. As noted previously, there are no combined sewer outfalls in the Indian Creek watershed, nor in the watershed of impaired Blue River segment WBID 0421.

Urban stormwater runoff from MS4 permitted entities is another likely significant contributor of point source bacteria loading to Blue River and Indian Creek. The Missouri side of the Blue River watershed contains portions of four permitted MS4 areas: Kansas City, with a site-specific permit, and Grandview, Raytown and Belton, with general stormwater permits. The MS4 wasteload allocations for each entity within each impaired segment watershed are established based on the proportion of watershed covered by that entity's permit. Bacterial contributions from MS4-permitted entities are precipitation dependent and vary with flow. Therefore, the MS4 wasteload allocations increase at higher storm flows as available diffuse flow increases.

The wasteload allocations established in this TMDL do not preclude the establishment of future point sources of bacterial loading in the watershed. Any future point sources should be evaluated against the TMDL and the range of flows, which any additional bacterial loading will affect.

7.1 TMDL Allocations for Blue River - All Segments

Table 14. *E. coli* TMDL for Blue River watershed over a range of flow conditions – Missouri and Kansas†

<i>Percentile Flow Exceedance</i>	<i>Flow (cfs)</i>	<i>Targets Based on Geometric Mean</i>			
		<i>TMDL (counts/day)</i>	<i>Sum WLA (counts/day)</i>	<i>LA (counts/day)</i>	<i>MOS (counts/day)</i>
95	22.5	1.13E+11	9.38E+10	8.09E+09	1.13E+10
90	26.6	1.34E+11	1.11E+11	9.57E+09	1.34E+10
70	50.8	2.56E+11	2.12E+11	1.83E+10	2.56E+10
50	89.8	4.52E+11	3.75E+11	3.23E+10	4.52E+10
30	165.7	8.35E+11	6.92E+11	5.97E+10	8.35E+10
10	486.6	2.45E+12	2.03E+12	1.75E+11	2.45E+11
5	955.7	4.82E+12	3.99E+12	3.44E+11	4.82E+11

† See Figure 12 load duration curve.

Table 15. *E. coli* TMDL for Blue River watershed over a range of flow conditions – Missouri only

<i>Percentile Flow Exceedance</i>	<i>Flow (cfs)</i>	<i>Targets Based on Geometric Mean</i>			
		<i>TMDL (counts/day)</i>	<i>Sum WLA (counts/day)</i>	<i>LA (counts/day)</i>	<i>MOS (counts/day)</i>
95	9.3	4.87E+10	4.37E+10	2.71E+08	4.71E+09
90	11.0	5.79E+10	5.21E+10	3.20E+08	5.57E+09
70	21.1	1.12E+11	1.01E+11	6.13E+08	1.07E+10
50	37.3	1.97E+11	1.77E+11	1.08E+09	1.88E+10
30	68.9	3.62E+11	3.25E+11	2.00E+09	3.47E+10
10	202.4	1.05E+12	9.46E+11	5.87E+09	1.02E+11
5	397.5	2.06E+12	1.85E+12	1.15E+10	2.00E+11

Table 16. *E. coli* WLA for Blue River watershed over a range of flow conditions – Wasteload allocations for Missouri designated MS4s and CSOs

<i>Percentile Flow Exceedance</i>	<i>Targets Based on Geometric Mean</i>				
	<i>CSO (counts/day)</i>	<i>Kansas City MS4 (counts/day)</i>	<i>Grandview MS4* (counts/day)</i>	<i>Raytown MS4 (counts/day)</i>	<i>Belton MS4* (counts/day)</i>
95	7.71E+08	3.96E+10	1.44E+09	1.01E+09	8.95E+08
90	1.54E+09	4.65E+10	1.69E+09	1.19E+09	1.05E+09
70	4.62E+09	8.84E+10	3.21E+09	2.26E+09	2.00E+09
50	7.71E+09	1.56E+11	5.68E+09	4.00E+09	3.53E+09
30	1.08E+10	2.90E+11	1.05E+10	7.42E+09	6.56E+09
10	1.39E+10	8.59E+11	3.13E+10	2.20E+10	1.94E+10
5	1.46E+10	1.69E+12	6.16E+10	4.33E+10	3.83E+10

7.2 TMDL Allocations for Blue River – WBID 0417

Table 17. *E. coli* TMDL for WBID 0417 impaired segment watershed over a range of flow conditions – Missouri only[†]

<i>Percentile Flow Exceedance</i>	<i>Flow (cfs)</i>	<i>Targets Based on Geometric Mean</i>			
		<i>TMDL (counts/day)</i>	<i>Sum WLA (counts/day)</i>	<i>LA (counts/day)</i>	<i>MOS (counts/day)</i>
95	0.6	2.97E+09	2.66E+09	8.23E+06	2.97E+08
90	0.7	3.51E+09	3.15E+09	8.40E+06	3.51E+08
70	1.3	6.72E+09	6.04E+09	1.25E+07	6.72E+08
50	2.4	1.19E+10	1.07E+10	2.31E+07	1.19E+09
30	4.3	2.19E+10	1.97E+10	5.00E+07	2.19E+09
10	12.8	6.43E+10	5.77E+10	1.84E+08	6.43E+09
5	25.1	1.26E+11	1.13E+11	3.89E+08	1.26E+10

[†] See Figure 13 load duration curve.

Table 18. *E. coli* WLA for WBID 0417 over a range of flow conditions – Wasteload allocations for Missouri designated MS4s and CSOs

<i>Percentile Flow Exceedance</i>	<i>Targets Based on Geometric Mean</i>				
	<i>CSO (counts/day)</i>	<i>Kansas City MS4 (counts/day)</i>	<i>Grandview MS4* (counts/day)</i>	<i>Raytown MS4* (counts/day)</i>	<i>Belton MS4* (counts/day)</i>
95	4.42E+08	2.22E+09	0	0	0
90	8.84E+08	2.27E+09	0	0	0
70	2.65E+09	3.38E+09	0	0	0
50	4.42E+09	6.24E+09	0	0	0
30	6.19E+09	1.35E+10	0	0	0
10	7.96E+09	4.98E+10	0	0	0
5	8.40E+09	1.05E+11	0	0	0

* MS4 entities not represented in the WBID 0417 impaired segment watershed.

7.3 TMDL Allocations for Blue River – WBID 0418

Table 19. *E. coli* TMDL for WBID 0418 impaired segment watershed over a range of flow conditions – Missouri and Kansas[†]

<i>Percentile Flow Exceedance</i>	<i>Flow (cfs)</i>	<i>Targets Based on Geometric Mean</i>			
		<i>TMDL (counts/day)</i>	<i>Sum WLA (counts/day)</i>	<i>LA (counts/day)</i>	<i>MOS (counts/day)</i>
95	4.7	2.36E+10	2.07E+10	5.77E+08	2.36E+09
90	5.5	2.79E+10	2.44E+10	6.76E+08	2.79E+09
70	10.6	5.34E+10	4.68E+10	1.28E+09	5.34E+09
50	18.7	9.43E+10	8.26E+10	2.26E+09	9.43E+09
30	34.5	1.74E+11	1.52E+11	4.21E+09	1.74E+10
10	101.4	5.11E+11	4.48E+11	1.25E+10	5.11E+10
5	199.2	1.00E+12	8.79E+11	2.47E+10	1.00E+11

[†] See Figure 14 load duration curve.

Table 20. *E. coli* TMDL for WBID 0418 impaired segment watershed over a range of flow conditions – Missouri only

<i>Percentile Flow Exceedance</i>	<i>Flow (cfs)</i>	<i>Targets Based on Geometric Mean</i>			
		<i>TMDL (counts/day)</i>	<i>Sum WLA (counts/day)</i>	<i>LA (counts/day)</i>	<i>MOS (counts/day)</i>
95	3.6	1.79E+10	1.60E+10	1.41E+07	1.83E+09
90	4.3	2.12E+10	1.90E+10	1.66E+07	2.16E+09
70	8.2	4.06E+10	3.65E+10	3.13E+07	4.14E+09
50	14.5	7.17E+10	6.43E+10	5.54E+07	7.31E+09
30	26.8	1.32E+11	1.18E+11	1.03E+08	1.35E+10
10	78.6	3.86E+11	3.46E+11	3.07E+08	3.96E+10
5	154.3	7.58E+11	6.79E+11	6.06E+08	7.78E+10

Table 21. *E. coli* WLA for WBID 0418 over a range of flow conditions – Wasteload allocations for Missouri designated MS4s and CSOs

<i>Percentile Flow Exceedance</i>	<i>Targets Based on Geometric Mean</i>				
	<i>CSO (counts/day)</i>	<i>Kansas City MS4 (counts/day)</i>	<i>Grandview MS4* (counts/day)</i>	<i>Raytown MS4 (counts/day)</i>	<i>Belton MS4* (counts/day)</i>
95	2.67E+08	1.49E+10	0	8.41E+08	0
90	5.33E+08	1.74E+10	0	9.86E+08	0
70	1.60E+09	3.30E+10	0	1.86E+09	0
50	2.67E+09	5.84E+10	0	3.30E+09	0
30	3.73E+09	1.09E+11	0	6.13E+09	0
10	4.80E+09	3.23E+11	0	1.83E+10	0
5	5.07E+09	6.38E+11	0	3.60E+10	0

* MS4 entities not represented in the WBID 0418 impaired segment watershed.

7.4 TMDL Allocations for Blue River – WBID 0419

Table 22. *E. coli* TMDL for WBID 0419 impaired segment watershed over a range of flow conditions – Missouri only[†]

<i>Percentile Flow Exceedance</i>	<i>Flow (cfs)</i>	<i>Targets Based on Geometric Mean</i>			
		<i>TMDL (counts/day)</i>	<i>Sum WLA (counts/day)</i>	<i>LA (counts/day)</i>	<i>MOS (counts/day)</i>
95	1.9	5.95E+09	5.35E+09	0	5.95E+08
90	2.3	7.03E+09	6.33E+09	0	7.03E+08
70	4.4	1.35E+10	1.21E+10	0	1.35E+09
50	7.7	2.38E+10	2.14E+10	0	2.38E+09
30	14.2	4.39E+10	3.95E+10	0	4.39E+09
10	41.8	1.29E+11	1.16E+11	0	1.29E+10
5	82.1	2.53E+11	2.28E+11	0	2.53E+10

[†] See Figure 15 load duration curve.

Table 23. *E. coli* WLA for WBID 0419 over a range of flow conditions – Wasteload allocations for Missouri designated MS4s and CSOs

<i>Percentile Flow Exceedance</i>	<i>Targets Based on Geometric Mean</i>				
	<i>CSO (counts/day)</i>	<i>Kansas City MS4 (counts/day)</i>	<i>Grandview MS4* (counts/day)</i>	<i>Raytown MS4 (counts/day)</i>	<i>Belton MS4* (counts/day)</i>
95	3.83E+07	5.27E+09	0	4.09E+07	0
90	7.65E+07	6.20E+09	0	4.81E+07	0
70	2.30E+08	1.18E+10	0	9.14E+07	0
50	3.83E+08	2.08E+10	0	1.62E+08	0
30	5.36E+08	3.87E+10	0	3.00E+08	0
10	6.89E+08	1.14E+11	0	8.87E+08	0
5	7.27E+08	2.25E+11	0	1.75E+09	0

* MS4 entities not represented in the WBID 0419 impaired segment watershed.

7.5 TMDL Allocations for Indian Creek – WBID 0420

Table 24. *E. coli* TMDL for WBID 0420 impaired segment watershed over a range of flow conditions – Missouri and Kansas[†]

<i>Percentile Flow Exceedance</i>	<i>Flow (cfs)</i>	<i>Targets Based on Geometric Mean</i>			
		<i>TMDL (counts/day)</i>	<i>Sum WLA (counts/day)</i>	<i>LA (counts/day)</i>	<i>MOS (counts/day)</i>
95	6.2	1.91E+10	1.72E+10	1.21E+07	1.91E+09
90	7.3	2.26E+10	2.04E+10	1.43E+07	2.26E+09
70	14.1	4.33E+10	3.90E+10	2.73E+07	4.33E+09
50	24.8	7.65E+10	6.88E+10	4.82E+07	7.65E+09
30	45.8	1.41E+11	1.27E+11	8.90E+07	1.41E+10
10	134.6	4.15E+11	3.73E+11	2.61E+08	4.15E+10
5	264.3	8.15E+11	7.33E+11	5.13E+08	8.15E+10

[†] See Figure 16 load duration curve.

Table 25. *E. coli* TMDL for WBID 0420 impaired segment watershed over a range of flow conditions – Missouri only

Percentile Flow Exceedance	Flow (cfs)	Targets Based on Geometric Mean			
		TMDL (counts/day)	Sum WLA (counts/day)	LA (counts/day)	MOS (counts/day)
95	0.5	1.61E+09	1.45E+09	0	1.61E+08
90	0.6	1.90E+09	1.71E+09	0	1.91E+08
70	1.2	3.64E+09	3.28E+09	0	3.65E+08
50	2.1	6.44E+09	5.79E+09	0	6.44E+08
30	3.9	1.19E+10	1.07E+10	0	1.19E+09
10	11.3	3.49E+10	3.14E+10	0	3.49E+09
5	22.3	6.85E+10	6.17E+10	0	6.86E+09

Table 26. *E. coli* WLA for WBID 0420 over a range of flow conditions – Wasteload allocations for Missouri designated MS4s and CSOs

Percentile Flow Exceedance	Targets Based on Geometric Mean				
	CSO** (counts/day)	Kansas City MS4 (counts/day)	Grandview MS4* (counts/day)	Raytown MS4* (counts/day)	Belton MS4* (counts/day)
95	0	1.45E+09	0	0	0
90	0	1.71E+09	0	0	0
70	0	3.28E+09	0	0	0
50	0	5.79E+09	0	0	0
30	0	1.07E+10	0	0	0
10	0	3.14E+10	0	0	0
5	0	6.17E+10	0	0	0

* MS4 entities not represented in the WBID 0420 impaired segment watershed.

** No CSOs in the WBID 0420 impaired segment watershed.

7.6 TMDL Allocations for Blue River – WBID 0421

Table 27. *E. coli* TMDL for WBID 0421 impaired segment watershed over a range of flow conditions – Missouri and Kansas[†]

Percentile Flow Exceedance	Flow (cfs)	Targets Based on Geometric Mean			
		TMDL (counts/day)	Sum WLA (counts/day)	LA (counts/day)	MOS (counts/day)
95	9.0	4.56E+10	2.42E+10	1.68E+10	4.56E+09
90	10.7	5.39E+10	2.86E+10	1.99E+10	5.39E+09
70	20.5	1.03E+11	5.48E+10	3.81E+10	1.03E+10
50	36.2	1.82E+11	9.67E+10	6.73E+10	1.82E+10
30	66.8	3.37E+11	1.79E+11	1.24E+11	3.37E+10
10	196.1	9.88E+11	5.24E+11	3.65E+11	9.88E+10
5	385.0	1.94E+12	1.03E+12	7.17E+11	1.94E+11

[†] See Figure 17 load duration curve.

Table 28. *E. coli* TMDL for WBID 0421 impaired segment watershed over a range of flow conditions – Missouri only

Percentile Flow Exceedance	Flow (cfs)	Targets Based on Geometric Mean			
		TMDL (counts/day)	Sum WLA (counts/day)	LA (counts/day)	MOS (counts/day)
95	2.7	1.18E+10	9.26E+09	1.18E+09	1.35E+09
90	3.2	1.39E+10	1.10E+10	1.39E+09	1.59E+09
70	6.0	2.67E+10	2.10E+10	2.66E+09	3.05E+09
50	10.7	4.71E+10	3.70E+10	4.70E+09	5.38E+09
30	19.7	8.69E+10	6.83E+10	8.68E+09	9.94E+09
10	57.9	2.55E+11	2.01E+11	2.55E+10	2.92E+10
5	113.7	5.01E+11	3.94E+11	5.00E+10	5.73E+10

Table 29. *E. coli* WLA for WBID 0421 over a range of flow conditions – Wasteload allocations for Missouri designated MS4s and CSOs

Percentile Flow Exceedance	Targets Based on Geometric Mean				
	CSO** (counts/day)	Kansas City MS4 (counts/day)	Grandview MS4 (counts/day)	Raytown MS4* (counts/day)	Belton MS4 (counts/day)
95	0	7.13E+09	1.31E+09	0	8.12E+08
90	0	8.44E+09	1.55E+09	0	9.61E+08
70	0	1.61E+10	2.96E+09	0	1.84E+09
50	0	2.85E+10	5.22E+09	0	3.25E+09
30	0	5.26E+10	9.64E+09	0	6.00E+09
10	0	1.55E+11	2.83E+10	0	1.76E+10
5	0	3.04E+11	5.56E+10	0	3.46E+10

* MS4 entity not represented in the WBID 0421 impaired segment watershed.

** No CSOs in the WBID 0421 impaired segment watershed.

8 Load Allocation (Nonpoint Source Load)

The load allocation is the allowable amount of the pollutant load that can be assigned to nonpoint sources and includes all existing and future nonpoint sources, as well as natural background contributions [40 CFR § 130.2(g)]. A review of land cover and aerial imagery shows that nonpoint sources within the Missouri side of the Blue River watershed currently includes agricultural lands, diffuse rural residential housing, and developed industrial areas outside of the municipal boundaries. Essentially all urban stormwater runoff within the watershed is regulated by MS4 permits and, as noted above, is considered a point source. Since only about 6 percent of the Blue River watershed in Missouri falls outside of the designated MS4 area, load allocations assigned to nonpoint sources are relatively low (zero in subwatersheds for impaired segments 0419 and 0420 in Missouri) when compared to point source wasteload allocations (see tables above). It should be noted that, as with point sources, nonpoint source loads contributed by the Kansas portion of the watershed are not considered to cause or contribute to the impairment, and in order to meet TMDL targets in Missouri it must be assumed that Missouri's water quality standards are met at the state line.

9 Margin of Safety

A margin of safety is required in the TMDL calculation to account for uncertainties in scientific and technical understanding of water quality in natural systems. The margin of safety is intended to account for such uncertainties in a conservative manner. Based on EPA guidance, the margin of safety can be achieved through one of two approaches:

- (1) Explicit - Reserve a portion of the loading capacity as a separate term in the TMDL.
- (2) Implicit - Incorporate the margin of safety as part of the critical conditions for the wasteload allocation and the load allocation calculations by making conservative assumptions in the analysis.

The margin of safety for these TMDLs is an explicit 10 percent as shown in Tables 14 through 26. Furthermore, bacterial decay or die off was not accounted for in the establishment of these TMDLs. This conservative assumption provides an additional implicit margin of safety.

10 Seasonal Variation

Federal regulations at 40 CFR §130.7(c)(1) require that TMDLs take into consideration seasonal variation in applicable standards. Missouri's water quality criteria for the protection of whole body contact recreation are applicable during the recreational season, defined as being from April 1 to October 31. However, the Blue River and Indian Creek TMDLs take seasonal variation into account through the use of load duration curves, which represent the allowable pollutant load across all seasons and under all flow conditions, including critical conditions. For this reason, the *E. coli* targets and allocations found in this TMDL will be protective throughout the recreational season. The results obtained using the load duration curve method are more robust and reliable over all flows and seasons when compared with those obtained under single-flow critical conditions.

11 Monitoring Plans

The Department has not scheduled post-TMDL monitoring for Blue River and Indian Creek. Post-TMDL monitoring is often scheduled and carried out by the Department approximately three years after the approval of the TMDL or in a reasonable time period following completion of permit compliance schedules and the application of new effluent limits. The Department will also routinely examine physical habitat, water quality, invertebrate community, and fish community data collected by other local, state and federal entities in order to assess the effectiveness of TMDL implementation. In addition, certain quality-assured data collected by universities, municipalities, private companies and volunteer groups may potentially be considered for monitoring water quality following TMDL implementation.

In the case of Blue River and Indian Creek, monitoring is scheduled to be conducted in accordance with the post-construction monitoring plan contained within the Overflow Control Plan. This plan outlines efforts to monitor and measure the effectiveness of the Overflow

Control Plan throughout the course of implementation, including before, during, and after completion of individual projects. The monitoring plan includes a water quality monitoring component that will focus on parameters, such as *E. coli*, related to concerns from combined sewer overflow discharges and upstream pollutant sources; it also includes measures to evaluate the effectiveness of combined sewer overflow controls, and other infrastructure projects aimed at wet-weather control (Kansas City 2009). The plan is mandated as part of the consent decree between Kansas City and EPA, and will be conducted in accordance with the Overflow Control Plan's Quality Assurance Project Plan. Water quality monitoring data may include those collected by the USGS, KDHE, and the Department. In turn, the Department may use this data to evaluate whether or not Blue River and Indian Creek meet Missouri's water quality standards and can be removed from the 303(d) List of impaired waters.

12 Implementation Plans

States are not required under Section 303(d) of the Clean Water Act to develop TMDL implementation plans and EPA does not approve or disapprove them. However, the Department will develop and make available for public comment a separate implementation plan to be established in conjunction with this TMDL. The implementation plan will provide additional detailed information regarding how point and nonpoint sources can or should be controlled to ensure that implementation efforts achieve the pollutant allocations identified in this TMDL.

Point source reductions are typically implemented with discharge permits administered through the Missouri State Operating Permit program in order to meet the requirements of Missouri's water quality standards and the National Pollutant Discharge Elimination System. In the case of combined sewer overflows and sanitary sewer overflows discussed in this TMDL, implementation should be completed in accordance with the Overflow Control Plan developed by the Kansas City Water Services Department, and with the consent decree established as part of the civil action *United States of America v. The City of Kansas City, Missouri*, No. 4:10-cv-0497-GAF. This consent decree was lodged with the U.S. District Court for the Western District of Missouri on May 18, 2010, and is incorporated by reference into the current Missouri State Operating Permit for the Kansas City Blue River Wastewater Treatment Facility. Point source reductions may also be implemented by establishing or enhancing stormwater controls within each of the four MS4 permits within the Missouri portion of the Blue River watershed. Such controls not only address pollutants that may be contributed by urban runoff, but may also have an impact on the volume and frequency of sewer overflows.

Because the Department does not regulate nonpoint sources, nonpoint source loading is typically reduced through the use of best management practices, or BMPs, that may be implemented to address and improve land use practices that may contribute bacteria to the impaired water body. Grant money from the Department's Section 319 Nonpoint Source Implementation Program may also be available for implementing nonpoint source controls in the watershed. It should be noted that nonpoint sources for Section 319 purposes may vary from what is presented in this TMDL. For example, urban runoff regulated by an MS4 permit is considered a point source for TMDL purposes, but in some instances can be considered a nonpoint source for Section 319 purposes.

This TMDL establishes the allowable bacteria loadings that each impaired segment of Blue River and Indian Creek can receive without violating water quality standards. Therefore, the TMDL provides a basis for establishing appropriate point and nonpoint source pollutant controls (EPA 2001). Any management practices already in place or being developed in the watershed to eliminate the impairment will be included in the TMDL implementation plan. These may include actions required as part of an operating permit, a watershed management plan, or the Overflow Control Plan. Table 30 presents the needed load reductions to successfully implement this TMDL and meet water quality standards under all flow conditions.

Table 30. Load reductions needed to meet water quality standards*

WB Segment	Percentile Flow Exceedance	Flow (cfs)	Observed Load (counts/day)	TMDL (counts/day)	Load Reduction (counts/day)	Percent Reduction (%)
Blue River	95	22.5	8.45E+10	1.13E+11	-2.87E+10	0.0%
	75	44.6	3.62E+11	2.25E+11	1.37E+11	37.92%
	50	89.8	7.70E+11	4.52E+11	3.17E+11	41.21%
	25	198.7	7.10E+12	1.00E+12	6.10E+12	85.90%
	5	955.7	2.13E+14	4.82E+12	2.08E+14	97.74%
0417	95	0.6	1.26E+10	2.97E+09	9.64E+09	76.5%
	75	1.2	1.80E+10	5.89E+09	1.21E+10	67.3%
	50	2.4	3.69E+11	1.19E+10	3.57E+11	96.8%
	25	5.2	1.08E+11	2.63E+10	8.22E+10	75.8%
	5	25.1	No data	1.26E+11	--	--
0418	95	4.7	2.66E+10	2.36E+10	2.98E+09	11.2%
	75	9.3	1.07E+11	4.68E+10	6.00E+10	56.2%
	50	18.7	1.82E+11	9.43E+10	8.75E+10	48.1%
	25	41.1	2.32E+12	2.09E+11	2.11E+12	91.0%
	5	199.2	4.84E+13	1.00E+12	4.74E+13	97.9%
0419	95	1.9	3.28E+09	5.95E+09	-2.67E+09	0.0%
	75	3.8	1.99E+10	1.18E+10	8.09E+09	40.7%
	50	7.7	5.87E+10	2.38E+10	3.49E+10	59.5%
	25	17.1	8.91E+11	5.26E+10	8.38E+11	94.1%
	5	82.1	1.43E+13	2.53E+11	1.41E+13	98.2%
0420	95	6.2	4.73E+10	1.91E+10	2.82E+10	59.6%
	75	12.3	1.33E+11	3.80E+10	9.39E+10	71.2%
	50	24.8	1.74E+11	7.65E+10	9.70E+10	55.9%
	25	54.9	1.38E+12	1.69E+11	1.21E+12	87.7%
	5	264.3	7.56E+13	8.15E+11	7.47E+13	98.9%
0421	95	9.0	4.42E+09	4.56E+10	-4.12E+10	0.0%
	75	18.0	9.94E+10	9.05E+10	8.93E+09	9.0%
	50	36.2	1.82E+11	1.82E+11	-4.97E+08	0.0%
	25	80.1	2.47E+12	4.04E+11	2.07E+12	83.7%
	5	385.05	8.86E+13	1.94E+12	8.67E+13	97.8%

*Based on geomeans of observed data within a specific flow condition (i.e., high flows, moist conditions, etc.)

This implementation plan will focus on the Missouri portion of the watershed, where the state of Missouri has both regulatory authority and the potential to work with nonpoint source

stakeholders. However, it is estimated within the Overflow Control Plan that approximately 61 percent of the total *E. coli* loading in Blue River comes from sources other than the city's combined sewer outfalls, and can be attributed in part to upstream sources (Kansas City 2009). Therefore, any implementation plan must also recognize efforts that have been established by the state of Kansas to reduce point and nonpoint sources of pollutants, and must also address ways in which Missouri and Kansas can work cooperatively to implement future pollutant reductions.

13 Reasonable Assurance

Section 303(d)(1)(C) of the federal Clean Water Act requires that TMDLs be established at a level necessary to implement applicable water quality standards. As part of the TMDL process, consideration must be given to the assurances that point and nonpoint source allocations will be achieved and water quality standards attained. Where TMDLs are developed for waters impaired by point sources only, reasonable assurance is derived from the NPDES permitting program through discharge permits issued with effluent limits as stringent as necessary to meet water quality standards [CWA Section 301(b)(1)(C)]. For impaired waters, these discharge permits must be issued so that effluent limits are consistent with the assumptions and requirements of approved TMDL wasteload allocations [40 CFR 122.44(d)(1)(vii)(B)]. The Department has the authority to issue and enforce Missouri State Operating Permits for point source discharges. Inclusion of effluent limits in a state operating permit and requiring that effluent and instream monitoring be reported to the Department should provide reasonable assurance that instream WQS will be met.

Where a TMDL is developed for waters impaired by both point and nonpoint sources, point source wasteload allocations must be stringent enough so that in conjunction with the water body's other loadings (i.e., nonpoint sources) water quality standards are met. This generally occurs when the TMDL's combined nonpoint source load allocations and point source wasteload allocations do not exceed the water quality standards-based loading capacity and there is reasonable assurance that the TMDL's allocations can be achieved. Reasonable assurance that nonpoint sources will meet their allocated amount in the TMDL is dependent upon the availability and implementation of nonpoint source pollutant reduction plans, controls or BMPs within the watershed. If BMPs or other nonpoint source pollution controls make more stringent load allocations practicable, then wasteload allocations can be made less stringent. Thus, the TMDL process provides for nonpoint source control tradeoffs [40 CFR 130.2(i)]. When a demonstration of nonpoint source reasonable assurance is developed and approved for an impaired water body, additional pollutant allocations for point sources may be allowed provided water quality standards are still attained. When a demonstration of nonpoint source reasonable assurance does not exist, or it is determined that nonpoint source pollutant reduction plans, controls or BMPs are not feasible, durable, or will not result in the required load reductions, allocation of greater pollutant loading to point sources cannot occur. Any discussion of detailed efforts relating to point and nonpoint source reductions will be found in the supplemental implementation plan to be developed by the Department following the recommendations found in Section 12 of this document.

A variety of grants and loans may be available to assist watershed stakeholders with developing and implementing watershed plans, controls and practices to meet the required wasteload and load allocations in the TMDL and demonstrate reasonable assurance.

14 Public Participation

The water quality-limited segments of Blue River and Indian Creek addressed with this TMDL are included on Missouri's 2010 303(d) List of impaired waters. EPA regulations require that TMDLs be subject to public review [40 CFR 130.7]. Before finalizing the Blue River and Indian Creek TMDL the public has been notified of a 45 day comment period. Public notices to comment on the draft Blue River and Indian Creek TMDL have been distributed via postal mail or e-mail to major stakeholders in the watershed, and other potentially impacted parties. Groups that received the public notice announcement include the Missouri Clean Water Commission; the Department's Water Quality Coordinating Committee; the Missouri Department of Conservation's Policy Coordinating Unit; the Cass County and Jackson County (Mo.) Soil and Water Conservation Districts; the Kansas City Water Services Department; the public works departments for the cities of Grandview, Raytown, and Belton; city clerks for these cities; the Cass County Planning, Environmental, Flood Plain and Solid Waste Dept.; the Cass County and Jackson County Commissions; the Mid-America Regional Council; the Blue River Watershed Association; Bridging the Gap; the Missouri Coalition for the Environment; the Missouri stream Team Watershed Coalition; the roughly 200 Stream Team volunteers living in or near the watershed; and the 18 Missouri state legislators representing areas within the watersheds. In addition, since Blue River and Indian Creek originate in Kansas and flow into Missouri, a public notice announcement was also sent to the Kansas Department of Health and Environment, Bureau of Water; Johnson County (Kan.) Wastewater; and Johnson County Infrastructure and Transportation. Announcement of the public notice period for this TMDL was also issued as a press release to local media outlets in the proximity of the Blue River and Indian Creek watersheds. Finally, the public notice, the TMDL Information Sheet, and this TMDL document have been posted on the Department's TMDL webpage at dnr.mo.gov/env/wpp/tmdl/wpc-tmdl-progress.htm, making them available to anyone with Internet access. Any comments received, and the Department's response to those comments, will be placed in the Blue River and Indian Creek TMDL administrative record, as noted below, and on the TMDL webpage.

15 Administrative Record and Supporting Documentation

An administrative record on the Blue River and Indian Creek TMDL has been assembled and is being kept on file with the Missouri Department of Natural Resources. It includes any plans, studies, data and calculations on which the TMDL is based, as well as the TMDL Information Sheet, the public notice announcement, and any public comments received. This information is available upon request to the Department at dnr.mo.gov/sunshine-form.htm. Any request for information on this TMDL will be processed in accordance with Missouri's Sunshine Law (Chapter 610, RSMO) and the Department's administrative policies and procedures governing Sunshine Law requests. For more information on open record/Sunshine requests, please consult the Department's website at dnr.mo.gov/sunshinerequests.htm.

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Appendix A

Blue River and Indian Creek *E. coli* data

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	<i>E. coli</i> (#/100mL)	Flow (cfs)
USGS	Blue R. at 12th Street	0417	370842	4328203	9/9/1998	540.0	70.0
USGS	Blue R. at 12th Street	0417	370842	4328203	10/15/1998	400.0	142.0
USGS	Blue R. at 12th Street	0417	370842	4328203	12/9/1998	6100.0	415.0
USGS	Blue R. at 12th Street	0417	370842	4328203	1/27/1999	970.0	51.0
USGS	Blue R. at 12th Street	0417	370842	4328203	2/18/1999	1010.0	224.0
USGS	Blue R. at 12th Street	0417	370842	4328203	5/10/1999	700.0	249.0
USGS	Blue R. at 12th Street	0417	370842	4328203	6/18/1999	10500.0	155.0
USGS	Blue R. at 12th Street	0417	370842	4328203	8/19/1999	530.0	41.0
USGS	Blue R. at 12th Street	0417	370842	4328203	10/14/1999	350.0	31.0
USGS	Blue R. at 12th Street	0417	370842	4328203	12/21/1999	1550.0	60.0
USGS	Blue R. at 12th Street	0417	370842	4328203	2/15/2000	0.499	30.0
USGS	Blue R. at 12th Street	0417	370842	4328203	4/11/2000	1300.0	34.0
USGS	Blue R. at 12th Street	0417	370842	4328203	6/30/2000	2200.0	68.0
USGS	Blue R. at 12th Street	0417	370842	4328203	8/22/2000	5500.0	30.0
USGS	Blue R. at 12th Street	0417	370842	4328203	10/11/2000	2600.0	36.0
USGS	Blue R. at 12th Street	0417	370842	4328203	10/31/2001	180.0	29.0
USGS	Blue R. at 12th Street	0417	370842	4328203	12/11/2001	460.0	41.0
USGS	Blue R. at 12th Street	0417	370842	4328203	3/14/2002	170.0	66.0
USGS	Blue R. at 12th Street	0417	370842	4328203	6/20/2002	310.0	48.0
USGS	Blue R. at 12th Street	0417	370842	4328203	8/6/2002	285.0	31.0
USGS	Blue R. at 12th Street	0417	370842	4328203	11/7/2002	1500.0	47.0
USGS	Blue R. at 12th Street	0417	370842	4328203	2/12/2003	200.0	24.0
USGS	Blue R. @ RR bridge nr. Scarritt Ave.	0417	370415	4330546	9/10/2004	9600.0	30.0
USGS	Blue R. 900 ft. ab. Mouth	0417	373267	4331571	9/15/2004	2600.0	30.0
USGS	Blue R. 900 ft. ab. Mouth	0417	373267	4331571	5/5/2005	860.0	55.0
USGS	Blue R. @ RR bridge nr. Scarritt Ave.	0417	370415	4330546	5/5/2005	2850	50.0
USGS	Blue R. 900 ft. ab. Mouth	0417	373267	4331571	8/2/2005	160.0	45.0
USGS	Blue R. @ RR bridge nr. Scarritt Ave.	0417	370415	4330546	8/2/2005	2100.0	40.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	9/9/1998	660.0	37.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	10/14/1998	190.0	126.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	12/9/1998	4600.0	323.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	1/21/1999	240.0	64.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	2/22/1999	1400.0	198.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	5/7/1999	3200.0	331.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	6/15/1999	2000.0	67.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	8/19/1999	940.0	39.0

¹ USGS = U.S. Geological Survey; KDHE = Kansas Department of Health and Environment; USEPA-7 = U.S. Environmental Protection Agency Region 7

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	<i>E. coli</i> (#/100mL)	Flow (cfs)
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	10/13/1999	4000.0	36.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	12/17/1999	150.0	58.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	2/14/2000	450.0	32.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	4/11/2000	1800.0	37.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	6/29/2000	920.0	20.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	8/22/2000	510.0	24.0
USGS	Blue R. 0.6 mi.ab. Brush Cr. @ Blue Parkway	0418	367853	4321714	10/11/2000	750.0	30.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	6/2/2003	8800.0	1830.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	6/11/2003	4800.0	500.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	6/29/2003	5100.0	481.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	7/8/2003	79.0	26.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	7/9/2003	18000.0	550.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	8/19/2003	49.0	19.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	9/11/2003	22000.0	520.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	12/2/2003	74.0	42.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	4/8/2004	16.0	86.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	5/25/2004	17200.0	2816.0
USGS	Blue R. 0.8 mi. bl. Brush Cr.	0418	369109	4322797	9/10/2004	276.0	77.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	9/10/2004	506.0	83.0
USGS	Blue R. 0.8 mi. bl. Brush Cr.	0418	369109	4322797	5/4/2005	61.0	40.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	5/4/2005	65.0	47.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	5/13/2005	2900.0	3105.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	6/1/2005	14000.0	1330.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	7/4/2005	11000.0	1340.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	7/26/2005	15000.0	768.0
USGS	Blue R. 0.8 mi. bl. Brush Cr.	0418	369109	4322797	8/2/2005	65.0	29.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	8/2/2005	170.0	37.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	10/6/2005	300.0	60.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	12/13/2005	440	89.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	3/29/2006	8.0	92.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	4/24/2006	23000.0	1110.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	4/28/2006	3900.0	685.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	6/6/2006	15000.0	1830.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	6/25/2006	19000.0	818.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	6/27/2006	230.0	68.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	11/2/2006	32.0	73.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	12/15/2006	43.0	78.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	2/24/2007	13000.0	1010.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	3/8/2007	18.0	180.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	3/29/2007	13000.0	868.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	4/26/2007	22000.0	1740.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	5/7/2007	46000.0	19400.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	8/8/2007	140.0	29.0
USGS	Blue R. @ Stadium Dr.	0418	369163	4324325	11/1/2007	71.0	58.0

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	E. coli (#/100mL)	Flow (cfs)
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	5/18/2010	250.0	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	5/26/2010	145.5	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	6/2/2010	>2419.6	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	6/3/2010	1986.3	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	6/9/2010	>24196.0	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	6/17/2010	30760.0	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	6/22/2010	378.4	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	6/24/2010	178.5	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	7/6/2010	11530.0	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	8/3/2010	149.7	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	8/17/2010	206.4	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	8/24/2010	328.2	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	9/8/2010	191.8	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	9/14/2010	12033.0	
USEPA-7	Blue River @ Coal Mine Rd.	0418	368392	4322447	9/20/2010	261.3	
USGS	Blue R. @ Bannister Road	0419	364910	4313183	8/20/1998	220.0	34.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	10/9/1998	120.0	270.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	12/3/1998	800.0	331.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	1/27/1999	640.0	41.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	2/22/1999	1400.0	108.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	5/6/1999	2700.0	581.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	6/10/1999	1000.0	39.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	7/21/1999	1680.0	37.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	10/13/1999	970.0	21.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	12/17/1999	75.0	43.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	2/14/2000	100.0	27.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/11/2000	740.0	23.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	6/29/2000	400.0	69.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	8/22/2000	170.0	21.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	10/11/2000	320.0	22.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	8/29/2001	540.0	60.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	10/31/2001	40.0	29.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	12/10/2001	20.0	30.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	3/14/2002	21.0	43.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	6/18/2002	2550.0	60.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	8/7/2002	0.499	25.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	11/5/2002	270.0	47.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	2/11/2003	16.0	24.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/23/2003	5500.0	832.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/24/2003	4600.0	439.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	5/9/2003	22000.0	1793.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	6/2/2003	8300.0	2463.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	7/8/2003	78.0	25.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	8/19/2003	100.0	20.0

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	E. coli (#/100mL)	Flow (cfs)
USGS	Blue R. @ Bannister Road	0419	364910	4313183	11/25/2003	1700.0	38.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/7/2004	69.0	88.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	5/25/2004	32500.0	3306.0
USGS	Blue River 1 mi.bl. Indian Cr.	0419	365314	4314031	9/9/2004	226.0	84.0
USGS	Blue R. @Bannister Road	0419	364910	4313183	9/9/2004	365.0	87.0
USGS	Blue River 1 mi.bl. Indian Cr.	0419	365314	4314031	5/3/2005	83.0	40.0
USGS	Blue R. @Bannister Road	0419	364910	4313183	5/3/2005	140.0	40.0
USGS	Blue R. bl. Gregory Blvd.	0419	367727	4317825	5/4/2005	100.0	40.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	5/13/2005	2100.0	2140.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	5/13/2005	9900.0	2840.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	6/1/2005	22000.0	973.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	7/3/2005	24000.0	1510.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	7/26/2005	9800.0	672.0
USGS	Blue R. bl. Gregory Blvd.	0419	367727	4317825	8/1/2005	80	22.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	8/1/2005	210.0	21.0
USGS	Blue River 1 mi.bl. Indian Cr.	0419	365314	4314031	8/1/2005	270.0	22.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	10/6/2005	260.0	58.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	12/6/2005	28.0	39.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	3/29/2006	30.0	61.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/24/2006	24000.0	1020.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/28/2006	1000.0	402.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/28/2006	9400.0	576.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	6/5/2006	27000.0	1630.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	6/27/2006	210.0	51.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	11/2/2006	62.0	53.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	12/15/2006	220.0	76.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	2/24/2007	2400.0	754.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	3/3/2007	19000.0	666.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	3/8/2007	140.0	170.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	4/25/2007	36000.0	2830.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	5/7/2007	18000.0	12700.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	8/8/2007	120.0	25.0
USGS	Blue R. @ Bannister Road	0419	364910	4313183	11/1/2007	184.0	47.0
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	5/26/2010	52.0	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	6/2/2010	>2419.6	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	6/3/2010	686.7	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	6/9/2010	17329.0	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	6/17/2010	7701.0	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	6/22/2010	81.3	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	6/24/2010	62.7	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	7/6/2010	7670.0	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	7/8/2010	2613.0	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	8/3/2010	65.7	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	8/18/2010	52.9	

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	<i>E. coli</i> (#/100mL)	Flow (cfs)
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	8/24/2010	201.4	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	9/8/2010	39.3	
USEPA-7	Blue R. @ Minor Park Golf Course at path crossing	0419	367903	4317322	9/14/2010	2382.0	
USEPA-7	Blue R. @ Bannister Road	0419	364910	4313183	9/20/2010	275.5	
USGS	Indian Cr. upstrm. Of Indian Cr. WWTP, Kansas	0420	350710	4308391	11/1/2001	65.0	1.4
USGS	Indian Cr. just bl. Indian Cr. WWTP, Kansas.	0420	352847	4309907	11/1/2001	270.0	10.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	11/1/2001	1200.0	20.0
USGS	Indian Cr. upstrm. Of Indian Cr. WWTP, Kansas	0420	350710	4308391	12/20/2001	42.0	0.83
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	12/20/2001	58.0	14.0
USGS	Indian Cr. just bl. Indian Cr. WWTP, Kansas.	0420	352847	4309907	12/20/2001	95.0	15.0
USGS	Indian Cr. upstrm. Of Indian Cr. WWTP, Kansas	0420	350710	4308391	3/21/2002	45.0	1.3
USGS	Indian Cr. just bl. Indian Cr. WWTP, Kansas.	0420	352847	4309907	3/21/2002	230.0	15.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	3/22/2002	0.499	32.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	6/19/2002	180.0	20.0
USGS	Indian Cr. upstrm. Of Indian Cr. WWTP, Kansas	0420	350710	4308391	6/19/2002	860.0	2.2
USGS	Indian Cr. just bl. Indian Cr. WWTP, Kansas.	0420	352847	4309907	6/19/2002	1100.0	14.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	8/6/2002	4600.0	21.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	11/7/2002	1100.0	36.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	2/12/2003	60.0	21.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	3/19/2003	740.0	171.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	4/19/2003	16000.0	1596.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	4/23/2003	3300.0	633.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	5/9/2003	30000.0	1468.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	6/2/2003	16000.0	1925.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	7/7/2003	200.0	20.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	8/18/2003	120.0	18.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	8/28/2003	170000.0	12811.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	8/31/2003	12000.0	7281.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	12/2/2003	35.0	23.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	12/30/2003	144.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	1/8/2004	108.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	3/2/2004	262.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	4/13/2004	110.0	30.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	5/6/2004	249.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	5/24/2004	41100.0	1163.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	7/8/2004	92.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	9/3/2004	265.0	36.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	9/9/2004	328.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	11/4/2004	6131.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	2/3/2005	272.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	4/7/2005	175.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	5/3/2005	73.0	20.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	6/2/2005	1789.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	8/1/2005	220.0	22.0

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	<i>E. coli</i> (#/100mL)	Flow (cfs)
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	8/4/2005	121.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	10/6/2005	161.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	10/11/2005	110.0	33.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	10/20/2005	1700.0	552.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	12/5/2005	70.0	20.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	12/8/2005	166.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	1/5/2006	1850.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	3/9/2006	10462.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	3/29/2006	3700	29.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	4/28/2006	20000.0	534.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	4/29/2006	6750	1210.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	5/4/2006	594.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	6/5/2006	2100.0	943.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	6/27/2006	350.0	28.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	7/6/2006	305.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	9/7/2006	160.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	11/1/2006	19.0	34.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	11/2/2006	4.99	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	12/14/2006	98.0	32.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	2/8/2007	12033.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	2/24/2007	9900.0	398.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	3/7/2007	8400.0	52.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	3/30/2007	22000.0	473.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	4/5/2007	836.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	4/25/2007	23000.0	949.0
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	5/7/2007	24000.0	3080.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	6/7/2007	216.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	8/8/2007	109.0	34.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	8/9/2007	17853.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	10/4/2007	259.0	
USGS	Indian Cr. Nr. State Line	0420	360929	4311542	11/1/2007	218.0	27.0
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	12/18/2007	148.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	1/9/2008	789.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	3/5/2008	20.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	5/7/2008	20.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	7/9/2008	1187.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	9/3/2008	3076.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	11/13/2008	134.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	2/4/2009	31.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	4/6/2009	20.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	6/3/2009	6488.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	8/25/2009	285.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	12/29/2009	148.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	1/13/2010	75.0	

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	<i>E. coli</i> (#/100mL)	Flow (cfs)
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	4/28/2010	63.0	
KDHE	Indian Cr. @ State Line Bridge	0420	360619	4311193	7/26/2010	530.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	8/29/2001	380.0	7.5
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	10/31/2001	300.0	6.8
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	12/11/2001	20.0	4.7
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	3/13/2002	100.0	5.8
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	6/18/2002	7600.0	20.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	8/7/2002	0.499	2.8
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	11/5/2002	80.0	11.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	2/11/2003	5.0	3.6
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	5/11/2003	17000.0	482.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	6/1/2003	5900.0	150.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	6/3/2003	23000.0	167.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	6/11/2003	18000.0	262.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	7/7/2003	45.0	3.6
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	8/18/2003	43.0	3.5
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	8/30/2003	7400.0	141.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	8/31/2003	24000.0	3776.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	11/25/2003	140.0	8.4
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	12/30/2003	97.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	1/8/2004	4.99	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	3/2/2004	4.99	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	4/8/2004	34.0	44.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	5/6/2004	20.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	5/25/2004	15700.0	1780.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	7/8/2004	175.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	9/3/2004	250.0	34.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	9/9/2004	609.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	11/4/2004	12033.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	2/3/2005	10.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	4/7/2005	52.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	5/3/2005	120.0	12.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	6/2/2005	41.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	8/1/2005	32.0	5.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	8/4/2005	10.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	10/6/2005	240.0	29.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	10/6/2005	441.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	12/6/2005	5.0	11.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	12/8/2005	10.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	1/5/2006	10.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	3/9/2006	20.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	3/29/2006	18.0	22.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	4/24/2006	17000.0	395.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	4/29/2006	1500.0	208.0

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	<i>E. coli</i> (#/100mL)	Flow (cfs)
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	5/4/2006	271.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	6/5/2006	18000.0	874.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	6/27/2006	250.0	16.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	7/6/2006	52.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	7/11/2006	16000.0	1070.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	7/12/2006	20000.0	1490.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	9/7/2006	121.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	11/1/2006	67.0	23.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	11/2/2006	173.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	12/14/2006	39.0	29.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	2/8/2007	4.99	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	2/24/2007	300.0	362.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	3/7/2007	15.0	61.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	3/30/2007	590.0	240.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	4/5/2007	404.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	4/25/2007	11000.0	972.0
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	5/7/2007	48000.0	6080.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	6/7/2007	158.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	8/8/2007	52.0	7.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	8/9/2007	1014.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	10/4/2007	75.0	
USGS	Blue R. 6.6 mi.ab.Indian Cr. @ Blue Ridge Blvd	0421	362908	4305691	11/1/2007	45.0	17.0
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	12/18/2007	210	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	1/9/2008	148.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	3/5/2008	41.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	5/7/2008	156.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	7/9/2008	620.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	9/3/2008	146.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	11/13/2008	246.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	2/4/2009	4.99	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	4/6/2009	63.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	6/3/2009	2909.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	8/25/2009	197.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	12/29/2009	31.0	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	1/13/2010	4.99	
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	4/28/2010	231.0	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	6/2/2010	>2419.6	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	6/3/2010	>2419.6	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	6/9/2010	>24196.0	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	6/17/2010	630.0	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	6/22/2010	517.2	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	6/24/2010	344.8	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	7/6/2010	18500.0	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	7/8/2010	2909.0	

Sampling Organization ¹	Site Description	WBID	UTM Easting	UTM Northing	Sampling Date	<i>E. coli</i> (#/100mL)	Flow (cfs)
KDHE	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	7/26/2010	1245.0	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	8/3/2010	307.6	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	8/18/2010	186.0	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	8/24/2010	866.4	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	9/8/2010	204.6	
USEPA-7	Blue R. 3.0 mi.ab. Indian Cr.	0421	363800	4309661	9/14/2010	11199.0	
USEPA-7	Blue R. 3 mi. SE of Stanley	0421	360057	4300512	9/20/2010	191.8	

Appendix A Notes:

These data are of sufficient quality to evaluate compliance with water quality standards and to support TMDL development because they were collected in accordance with required quality assurance procedures and Department sampling protocols.

Detection limits and non-detects are expressed as "less-than" numbers and show up in this table as those data ending in 99. Example: <1 will appear as 0.499.

Numbers expressed in this table as "greater-than" values (>) are retained as such in this table, but are doubled for calculation purposes, in keeping with the Department's assessment methodology.

An empty cell means no data available.

Appendix B

Missouri General (MOG) and Storm Water (MOR) Permits in the Blue River and Indian Creek Watersheds

Permit No.	Facility Name	Receiving Stream	Permit Type	Permit Expiration Date
MO-G490239	LaFarge North America-8	Blue River	General	10/5/2016
MO-G490243	Derbigium Americas, Inc.	Tributary to Brush Creek	General	10/5/2016
MO-G490259	Superior Bowen Asphalt Co.	Tributary to Blue River	General	10/5/2016
MO-G490447	KC Wilbert Vault	Tributary to Kernoodle Lakes	General	10/5/2016
MO-G490522	Vance Brothers, Inc.	Tributary to Blue River	General	10/5/2016
MO-G490523	Fordyce Concrete Co.	Blue River	General	10/5/2016
MO-G490576	Vance Brothers, Inc.	Blue River	General	10/5/2016
MO-G490577	Superior Bowen Asphalt Co.	Tributary to Blue River	General	10/5/2016
MO-G490580	Allied Concrete Products	Tributary to Blue River	General	10/5/2016
MO-G490668	J.M. Fahey Construction	Brush Creek	General	10/5/2016
MO-G490695	Miller, an Oldcastle Co.	Tributary to Blue River	General	10/5/2016
MO-G490860	Bledsoe's Rental Co.	Tributary to Blue River	General	10/5/2016
MO-G490914	Penny's Concrete, Inc.	Tributary to Blue River	General	10/5/2016
MO-G490915	Damon Pursell Construction Co.	Tributary to Blue River	General	10/5/2016
MO-G491040	All American Redi-mix	Tributary to Blue River	General	10/5/2016
MO-G491089	Hot Mix Materials, Inc.	Tributary to Blue River	General	10/5/2016
MO-G491177	Clarkson Construction Co., Plant 6206	Tributary to Blue River	General	10/5/2016
MO-G690060	Loch Lloyd Community Lake	Tributary to Mill Creek	General	3/13/2013
MO-G760062	Super Splash USA	Tributary to Round Grove Creek	General	4/9/2014
MO-G970009	Suburban Lawn and Garden	Tributary to Blue River	General	11/29/2012
MO-G970022	Damon Purcell Construction Co.	Tributary to Blue River	General	11/29/2012
MO-G970026	Lawn Corps, Inc.	Tributary to Mill Creek	General	11/29/2012
MO-R040015	Grandview Small MS4	Tributary to Blue River	Stormwater	6/12/2013
MO-R040018	Belton Small MS4	Tributary to Mill Creek	Stormwater	6/12/2013
MO-R040021	Raytown Small MS4	Tributary to Blue River	Stormwater	6/12/2013
MO-R104435	Fairway Ridge Subdivision	Tributary to Mill Creek	Stormwater	2/7/2012
MO-R105063	7425 Stadium Drive	Tributary to Blue River	Stormwater	2/7/2012
MO-R109814	State Line Station Unit #	Tributary to Blue River	Stormwater	3/7/2012

Permit No.	Facility Name	Receiving Stream	Permit Type	Permit Expiration Date
MO-R109AI9	UMKC Oak Street West Development	Tributary to Brush Creek	Stormwater	3/7/2012
MO-R109FD8	Blue River Pipeline Crossing	Blue River	Stormwater	3/7/2012
MO-R109FN3	KC Police Dept. SPD SOD	Tributary to Blue River	Stormwater	3/7/2012
MO-R109GK7	6400 E. 40 Hwy.	Blue River	Stormwater	3/7/2012
MO-R109X52	Swope Park Soccer Facility	Tributary to Blue River	Stormwater	3/7/2012
MO-R10A570	Advance Stores Co., Inc.	Tributary to Blue River	Stormwater	2/7/2012
MO-R10A610	The Townhomes at Royal Village	Tributary to Riss Lake	Stormwater	2/7/2012
MO-R10A676	Kirkwood Circle	Tributary to Brush Creek	Stormwater	2/7/2012
MO-R10B045	Superior Bowen Asphalt Co.	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B131	Holiday Inn Express	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B152	Armour Homes	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B163	Faith Estates	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B197	Rockhurst High School	Tributary to Dyke Branch	Stormwater	2/7/2012
MO-R10B254	Riter Pump Station	Lake of Loch Lloyd	Stormwater	2/7/2012
MO-R10B292	Swope Park Soccer Field 3	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B407	Cerner Innovation Campus	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B410	Lot 40 Bi-State Business	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B488	Concord Woods	Tributary to Blue River	Stormwater	2/7/2012
MO-R10B622	UMB Bank	Tributary to Brush Creek	Stormwater	2/7/2012
MO-R10C026	Beck Tire	Tributary to Blue River	Stormwater	2/7/2012
MO-R10C041	Parkway Baptist Church	Tributary to Blue River	Stormwater	2/7/2012
MO-R10C120	Corner Plaza	Tributary to Blue River	Stormwater	2/7/2012
MO-R10C150	Citadel Plaza	Tributary to Mill Creek	Stormwater	2/7/2012
MO-R10C221	Centennial Business Park	Tributary to Blue River	Stormwater	2/7/2012
MO-R10D010	United Believers Community Church	Tributary to Blue River	Stormwater	2/7/2012
MO-R10D085	Saint Luke's Health System	Tributary to Brush Creek	Stormwater	2/7/2012
MO-R10D096	Swope Gardens	Tributary to Blue River	Stormwater	2/7/2012
MO-R10D333	Truck Trailer and Hitch Center	Tributary to Blue River	Stormwater	2/7/2012
MO-R10D365	Palestine Commons Independent Senior Living	Tributary to Brush Creek	Stormwater	2/7/2012
MO-R10D376	Congregation of Jehovah's Witnesses	Tributary to Blue River	Stormwater	2/7/2012
MO-R10D467	Brywood Centre Rehabilitation	Tributary to Blue River	Stormwater	2/7/2012
MO-R10D508	McDonald's	Tributary to Blue River	Stormwater	2/7/2012
MO-R10D787	Rockhurst University N. Garage	Tributary to Brush Creek	Stormwater	2/7/2012

Permit No.	Facility Name	Receiving Stream	Permit Type	Permit Expiration Date
MO-R10D946	Ward Parkway Center	Tributary to Dyke Branch	Stormwater	2/7/2012
MO-R10D984	Dollar General	Tributary to Blue River	Stormwater	2/7/2012
MO-R10E059	St. Teresa's Academy Track and Field	Tributary to Brush Creek	Stormwater	2/7/2012
MO-R10E156	Innovation Campus N. Parking	Tributary to Hart Grove Creek	Stormwater	2/7/2012
MO-R10E190	Oak Street Parking Garage	Tributary to Blue River	Stormwater	2/7/2012
MO-R130032	International Paper	Tributary to Blue River	Stormwater	5/29/2013
MO-R130111	Cook's Ham, Inc.	Tributary to Blue River	Stormwater	5/29/2013
MO-R130130	Pepsi Beverages Co.	Tributary to Blue River	Stormwater	5/29/2013
MO-R203101	Labconco Corp.	Tributary to Blue River	Stormwater	6/14/2014
MO-R203157	Thyssen Krupp Access Corp.	Tributary to Little Blue River	Stormwater	6/14/2014
MO-R203207	The Bratton Corp.	Tributary to Blue River	Stormwater	6/14/2014
MO-R203252	Automatic Systems, Inc.	Tributary to Round Grove Creek	Stormwater	6/14/2014
MO-R203277	A and A Bumper Plating, Inc.	Tributary to Rock Creek	Stormwater	6/14/2014
MO-R203297	Clay and Bailey Manufacturing, Inc.	Tributary to Blue River	Stormwater	6/14/2014
MO-R203307	Central Power Products, Inc.	Tributary to Blue River	Stormwater	6/14/2014
MO-R203332	SPX Cooling Technologies	Tributary to Blue River	Stormwater	6/14/2014
MO-R23D029	Nitto Denko Automotive	Tributary to Blue River	Stormwater	2/3/2016
MO-R23D048	Peterson Manufacturing Co.	Tributary to Blue River	Stormwater	2/3/2016
MO-R60A008	Langley Recycling, Inc.	Tributary to Big Blue River	Stormwater	5/29/2013
MO-R60A052	Rich Industries, Inc.	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A145	Pick-n-Pull Auto Dismantlers	Blue River	Stormwater	5/29/2013
MO-R60A171	C and H Auto Parts	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A187	All Star Auto Parts	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A199	C and H Auto Parts	Blue River	Stormwater	5/29/2013
MO-R60A251	Late Model Auto Parts	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A259	Porter Auto Salvage	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A260	Little Will's Auto Salvage	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A261	Custom Truck and Equipment	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A264	Economy Auto Salvage	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A266	Marvin's Automotive, LLC	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A269	Jay's Salvage	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A272	AAA Auto Repair	Tributary to Blue River	Stormwater	5/29/2013

Permit No.	Facility Name	Receiving Stream	Permit Type	Permit Expiration Date
MO-R60A275	Avenue Auto Wrecking, Inc.	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A277	A3 Auto Salvage and Wrecking	Tributary to Blue River	Stormwater	5/29/2013
MO-R60A279	A3 Auto Wrecking	Tributary to Blue River	Stormwater	5/29/2013
MO-R80C399	Durham School Services	Tributary to Blue River	Stormwater	10/4/2012
MO-R80C420	Cragtree Harmon	Tributary to Blue River	Stormwater	10/4/2012
MO-R80C436	First Student, Inc.	Tributary to Blue River	Stormwater	10/4/2012
MO-R80C495	Superior Bowen Asphalt Co.	Tributary to Blue River	Stormwater	10/4/2012
MO-R80C496	McCormack-Payton Co.	Tributary to Kernoodle Lakes	Stormwater	10/4/2012
MO-R80H086	Material Recovery and Transfer	Tributary to Blue River	Stormwater	7/23/2014
MO-R80H123	Manchester Transfer, LLC	Tributary to Blue River	Stormwater	7/23/2014
MO-RA00145	Avila University Residence Hall	Tributary to the Blue River	Stormwater	2/7/2017
MO-RA00165	Wayside Waifs	Tributary to Blue River	Stormwater	2/7/2017
MO-RA00783	4840 Roanoke	Tributary to Brash Creek	Stormwater	2/7/2017
MO-RA00875	Molle VW Service Center	Tributary to Indian Creek	Stormwater	2/7/2017
MO-RA00894	Rew Properties, LLC	Tributary to Blue River	Stormwater	2/7/2017
MO-RA00895	Loch Lloyd Pkwy. and Res. Dev.	Mill Creek & Blue River	Stormwater	2/7/2017
MO-RA00899	The Country Club of Loch Lloyd	Tributary to Mill Creek	Stormwater	2/7/2017
MO-RA00998	Loch Lloyd Phase 1A	Tributary to Mill Creek	Stormwater	2/7/2017
MO-RA01000	Ward Parkway Center	Tributary to Dyke Branch	Stormwater	2/7/2017
MO-RA01068	UMKC MNL Classroom Add.	Tributary to Brush Creek	Stormwater	2/7/2017
MO-RA01093	Dodson Industrial Park	Blue River	Stormwater	2/7/2017
MO-RA01096	Tom Smith Lakes	Tributary to the Blue River	Stormwater	2/7/2017
MO-RA01133	Blue River Channel Modification	Blue River	Stormwater	2/7/2017
MO-RA01246	Dollar General - Truman Road	Tributary to Blue River	Stormwater	2/7/2017
MO-RA01299	UMKC Bloch Hall Addition	Tributary to Brush Creek	Stormwater	2/7/2017

Kansas Construction and Industrial Permits in the Blue River and Indian Creek Watersheds

Permit No.	Facility Name	Permit Type
G-MO14-0001	US POSTAL SER OLATHE EAST BRANCH OFC	Industrial
G-MO14-0003	JOHNSON CO EXECUTIVE AIRPORT	Industrial
G-MO14-0004	KANSAS CITY AVIATION CENTER	Industrial
G-MO14-0005	OLATHE DISTRIBUTION CENTER (TYSON)	Industrial
G-MO14-0006	SYSCO KANSAS CITY, INC.	Industrial
G-MO27-0001	TOMAHAWK CREEK WWTP	Industrial
G-MO28-0005	DOUGLAS L SMITH MIDDLE BASIN WWTP	Industrial
G-MO28-0006	BLUE RIVER MAIN WWTP	Industrial
G-MO30-0001	CCBC OF MID AMERICA (COCA-COLA)	Industrial
G-MO30-0003	FEDEX GROUND-HOME DELIVERY	Industrial
G-MO30-0004	WILLIAMS FOODS (99TH ST.)	Industrial
G-MO30-0005	FED EX EXPRESS - IXDA	Industrial
G-MO30-0007	BRODERSON MANUFACTURING CORPORATION	Industrial
G-MO32-0001	USPS OXFORD CARRIER ANNEX	Industrial
S-MO14-0015	GREENWOOD BUSINESS CENTER	Construction
S-MO14-0025	HUNTER'S CREEK	Construction
S-MO14-0034	WILLOWBROOKE VILLAS	Construction
S-MO14-0035	MAPLE BROOK PARK	Construction
S-MO14-0050	FALLBROOK	Construction
S-MO14-0058	MAE CREST	Construction
S-MO14-0065	BRIGHTON'S LANDING, FIRST PLAT	Construction
S-MO14-0080	HIGHLANDS OF KENSINGTON	Construction
S-MO14-0085	SUMMERWOOD DEVELOPMENT	Construction
S-MO14-0090	FAIRFIELD AT HERITAGE PARK - 1ST PLAT	Construction
S-MO14-0093	HERITAGE MANOR - 1ST PLAT	Construction
S-MO14-0099	COFFEE CREEK MEADOWS	Construction
S-MO14-0101	MUR-LEN CROSSING	Construction
S-MO14-0104	AVIGNON - 2ND PLAT	Construction
S-MO14-0105	HERITAGE MANOR - 2ND PLAT	Construction
S-MO14-0112	ASHFORD VILLAS	Construction
S-MO14-0113	WYNGATE - 2ND PLAT	Construction
S-MO14-0114	RIDGEVIEW ROAD (175TH ST. 7100' NORTH)	Construction
S-MO14-0116	FAIRFIELD AT HERITAGE PARK - 2ND PLAT	Construction
S-MO14-0117	FAIRFIELD AT HERITAGE PARK - 3RD PLAT	Construction
S-MO14-0119	AUSTIN PARK - 1ST PLAT	Construction

Permit No.	Facility Name	Permit Type
S-MO14-0122	NOTTINGTON CREEK - 5TH PLAT	Construction
S-MO14-0126	FOREST HILLS ESTATES - 3RD PLAT	Construction
S-MO14-0127	CULVERT REPLACEMENT 183RD ST OVER TRIB.	Construction
S-MO14-0128	INDIAN CREEK ELEMENTARY SCHOOL	Construction
S-MO14-0129	COUNTRY SIDE ELEMENTARY SCHOOL	Construction
S-MO14-0131	AVIGNON - 3RD PLAT	Construction
S-MO14-0133	OLATHE SOUTH HIGH SCHOOL	Construction
S-MO14-0134	OLATHE EAST HIGH SCHOOL	Construction
S-MO14-0137	SOUTH INDIAN CREEK TRAIL	Construction
S-MO14-0138	BNSF WEST TRACK QUIET ZONE	Construction
S-MO14-0139	LATERAL SEWER DIST NO 6 OF TOMAHAWK CRK	Construction
S-MO14-0140	MP-05252 - 36" WATER TRANS. MAIN PROJEC	Construction
S-MO14-0141	HARMONY VIEW WEST	Construction
S-MO14-0142	AVIGNON - 5TH PLAT	Construction
S-MO14-0143	HEATHER RIDGE - 3RD PLAT	Construction
S-MO14-0144	FAMILY VIDEO - OLATHE, KS	Construction
S-MO14-0145	HY-VEE, OLATHE #1	Construction
S-MO14-0146	HILTON GARDEN INN	Construction
S-MO27-0014	SHOPS AT 119TH	Construction
S-MO27-0021	MISSION CORNER	Construction
S-MO27-0022	GLEN ABBEY OF LEAWOOD	Construction
S-MO27-0029	IRONHORSE CENTRE, LOT 7 & 8	Construction
S-MO27-0035	SABATES EYE CENTERS	Construction
S-MO27-0036	IRONWOODS POND	Construction
S-MO27-0037	ESTATES OF OLD LEAWOOD	Construction
S-MO27-0038	LEABROOKE - 5TH PLAT	Construction
S-MO27-0039	CENTENNIAL PARK	Construction
S-MO27-0040	GEZER PARK	Construction
S-MO27-0041	LEABROOKE - 7TH PLAT	Construction
S-MO27-0042	LEABROOKE - 6TH PLAT	Construction
S-MO27-0047	CENTENNIAL PARK - OVERBROOK	Construction
S-MO27-0048	POWER SPECIALTIES - LOT 12 BI-STATE BUS	Construction
S-MO27-0051	LITTLE SUNSHINE'S PLAYHOUSE	Construction
S-MO27-0054	BI-STATE CENTENNIAL PARK	Construction
S-MO27-0056	LOT 1, TOWN CTR BUS. CTR, 5TH PLAT	Construction
S-MO28-0007	ANTIOCH 127	Construction
S-MO28-0029	HERITAGE OF OVERLAND PARK	Construction

Permit No.	Facility Name	Permit Type
S-MO28-0058	SOUTHCREEK BUSINESS PARK	Construction
S-MO28-0060	RIVER RIDGE FARMS WEST 2ND PLAT	Construction
S-MO28-0065	REGIONAL MALL	Construction
S-MO28-0080	HAMPTON PLACE	Construction
S-MO28-0084	TALLGRASS AT THE WILDERNESS	Construction
S-MO28-0087	CRYSTAL SPRINGS	Construction
S-MO28-0094	COMMERCIAL PARK	Construction
S-MO28-0097	AGS APARTMENTS	Construction
S-MO28-0100	MILLS FARM - 1ST PLAT	Construction
S-MO28-0127	CHAPEL HILL - 1ST PLAT	Construction
S-MO28-0139	POLO FIELDS	Construction
S-MO28-0146	THE VINEYARD	Construction
S-MO28-0160	DOUGLAS L. SMITH MIDDLE BASIN TREATMENT	Construction
S-MO28-0166	COFFEE CREEK CROSSING - 3RD PLAT	Construction
S-MO28-0168	OAK PARK MALL SHOPPING CENTER	Construction
S-MO28-0170	BLUE VALLEY ELEMENTARY #22 (BLDG.)	Construction
S-MO28-0174	PRAIRIEFIRE AT LIONSGATE	Construction
S-MO28-0181	CRYSTAL SPRINGS - 3RD PLAT	Construction
S-MO28-0182	MISSION 159	Construction
S-MO28-0183	OAK PARK MALL REDEVELOPMENT	Construction
S-MO28-0184	MISSION FARMS WEST	Construction
S-MO28-0189	HIGHLANDS VILLAGE	Construction
S-MO28-0190	THE FARM AT GARNET HILL - 1ST PLAT	Construction
S-MO28-0194	ADDITIONS & RENOVATIONS ON BLUE VALLEY	Construction
S-MO28-0195	COLTON RANCH	Construction
S-MO28-0196	BLUE VALLEY NORTH BASEBALL & SOFTBALL F	Construction
S-MO28-0199	WOODS AT COLTON LAKE - 3RD PLAT	Construction
S-MO28-0200	LAKESHORE	Construction
S-MO28-0201	151ST AND METCALF CENTER	Construction
S-MO28-0202	CHILDREN'S MERCY SOUTH HOSPITAL	Construction
S-MO28-0203	OVERLAND POINTE	Construction
S-MO28-0204	WINCREST - LOT 4	Construction
S-MO28-0205	ROCKBROOK OFFICE PARK	Construction
S-MO28-0206	COLONNADE OFFICE SUITES	Construction
S-MO28-0207	CVS/PHARMACY #5271	Construction
S-MO28-0208	BLUE RIVER NO. 26 SAN SEWER INTERCEPTOR	Construction
S-MO28-0212	DOUBLE TAKE SALON AND DAY SPA	Construction

Permit No.	Facility Name	Permit Type
S-MO28-0213	US 69 - 75TH TO 95TH (KDOT 69-46 K8251-	Construction
S-MO28-0215	STONEPOST RANCH	Construction
S-MO28-0216	159TH ST. AND ANTIOCH RD. STOCKPILE	Construction
S-MO28-0218	KDOT 69-46 K-8251-07 (US 69 HWY RECONST	Construction
S-MO28-0219	CHEROKEE SOUTH PLAZA	Construction
S-MO28-0220	COFFEE CREEK CROSSING - 4TH PLAT	Construction
S-MO28-0221	OSAGE PARK	Construction
S-MO28-0222	71ST TO 74TH, REEDS TO MAPLE	Construction
S-MO28-0223	DOUGLAS L SMITH MIDDLE BASIN WWTP #19	Construction
S-MO28-0224	BLUE RIVER 10, CONTRACT DISTRICT 2	Construction
S-MO28-0225	CAMBRIDGE CHURCH	Construction
S-MO28-0227	OAK PARK MALL SHOPPING CTR LOT 1, BLOCK	Construction
S-MO28-0228	ELITE SQUAD TENNIS, INC.	Construction
S-MO28-0231	SE CAMPUS QUADRANT URBAN STORMWATER MAN	Construction
S-MO28-0232	BLUE VALLEY BAPTIST CHURCH	Construction
S-MO28-0233	KIDDI KOLLEGE	Construction
S-MO28-0235	WILSHIRE FARMS - 6TH PLAT	Construction
S-MO28-0236	MEADOWS OF MILL FARM	Construction
S-MO28-0237	143RD STREET (QUIVIRA TO SWITZER)	Construction
S-MO28-0238	2010 MAJOR STORM REPAIR SECTION A & B	Construction
S-MO28-0239	MEADOWS OF MILLS FARM, 2ND PLAT	Construction
S-MO28-0240	OVERLAND PARK ASPHALT PATH-LAMAR AVE 13	Construction
S-MO28-0241	MILLS FARM, 8TH PLAT	Construction
S-MO28-0242	BURGER KING	Construction
S-MO28-0243	ISLAMIC CENTER OF JOHNSON COUNTY	Construction
S-MO28-0244	127TH ST. RECONSTRUCTION	Construction
S-MO28-0245	OVERLAND PARK ARBORETUM LPS	Construction
S-MO28-0246	STONEPOST RANCH RETAIL PHASE I	Construction
S-MO30-0010	COLLEGE CROSSINGS NORTH	Construction
S-MO30-0011	COLLEGE CROSSINGS SOUTH	Construction
S-MO32-0011	RIVER RIDGE FARMS WEST 6TH PLAT	Construction
S-MO32-0019	LAKE AT SOUTHWICK - PHASE 2	Construction
S-MO32-0020	OAKLEAF RIDGE - 2ND PLAT	Construction
S-MO32-0021	BLUE RIVER NO 25, CONTRACT 1 GRAVITY SE	Construction
S-MO32-0022	160TH TERR. & KRANKER DR. IMPVS.	Construction
S-MO32-0023	CULVERT V.84-2.35 LOCUST ST OVER TRIB C	Construction
S-MO32-0024	M&H PARKING LOT EXPANSION	Construction

Permit No.	Facility Name	Permit Type
S-MO32-0025	VILLAS OF RIVER RIDGE FARMS	Construction

Appendix C

Blue River Watershed Combined Sewer Overflows in the Kansas City, Missouri Water Services Department Overflow Control Plan

MDNR Outfall ID	Location Description	Typical Year Annual Overflow Volume (MG)	Estimated Recreation Season Overflow Volume (MG) ¹
6	50 th & Stateline	0.00	0.00
7	50 th Terrace & Brush Creek	0.70	0.30
8	49 th Terrace & Westwood Road	15.67	1.98
9	50 th & Holly	<i>included with 008</i>	0.09
10	50 th & Brush Creek	0.17	0.01
11	Roanoke & Brush Creek	3.73	0.66
12	Summit & Brush Creek	0.04	0.04
13	47 th & Wornall	0.26	0.14
14	49 th & Wornall	0.14	0.06
15	Nichols Road & Wornall	0.44	0.24
16	Main Street & Brush Creek	0.00	0.00
17	46 th Terrace & Wornall	57.90	0.71
18	48 th & Harrison	113.44	0.26
19	49 th & Troost	3.05	2.09
20	48 th & The Paseo	52.27	0.37
21	47 th & The Paseo	201.07	1.63
23	46 th & Woodland	14.19	9.68
24	45 th & Garfield	31.80	0.37
25	46 th & Prospect	2.74	1.97
26	49 th & Chestnut	12.20	0.07
27	45 th & Mersington	21.90	0.34
28	46 th & Norton	0.31	0.04
29	51 st Terrace & Brookside	116.35	0.14
30	4200 Brush Creek	807.77	1.03
32	Belmont Avenue & Belmont Blvd.	0.08	0.36
33	Wilson & Bennington	676.38	238.11
34	8 th Street at Blue River	5.97	2.44
36	18 th Street at Blue River	30.17	18.68
37	35 th Street at Blue River	57.44	5.03
39	33 rd Terrace & Topping	73.63	42.76
40	41 st & Elmwood	22.80	2.72
41	40 th & Cleveland	7.51	0.00
43	40 th Terrace & Cleveland	1.40	0.00
44	40 th Terrace & Myrtle	0.02	0.00
45	41 st & Myrtle	0.00	0.00
46	41 st Norton	0.00	0.00
47	41 st & Jackson	0.52	0.00

MDNR Outfall ID	Location Description	Typical Year Annual Overflow Volume (MG)	Estimated Recreation Season Overflow Volume (MG)¹
48	45 th Terrace & Lister	1.85	0.02
49	41 st & Spruce	0.00	0.00
50	Spruce & Towers Road	1.84	0.00
51	Skiles & Winner Road	2.02	1.68
52	Truman & Crystal	1.03	0.00
54	17 th & Belmont	3.56	0.00
55	I-70 & White	0.75	2.82
56	55 th & Elmwood	9.67	7.03
57	76 th & Indiana	2.61	1.46
58	83 rd Terrace & McGee	3.23	0.32
59	85 th & Tracy	17.11	6.79
60	58 th & Kensington	3.08	2.23
61	58 th & Elmwood	8.09	5.87
62	63 rd Terrace & Elmwood	5.40	3.94
63	69 th & Cleveland	10.19	0.00
64	Gregory & Mersington	1.06	0.15
65	81 st Terrace & Campbell	0.02	0.00
66	84 th & Main	0.07	0.03
67	83 rd & Main	8.17	0.27
68	85 th & Flora	2.10	1.56
69	77 th & Prospect	69.38	19.50
70	Meyer at Blue River	0.48	0.31
manholes	various locations	8.40	0.00
79	51 st & Indiana	4.70	1.30
80	53 rd & Walrond	7.61	0.77
81	53 rd Terrace & Walrond	25.88	0.00
82	55 th & Indiana	7.44	0.02
83	57 th & Agnes	8.12	5.42
85	59 th & Prospect	7.12	0.44
89	61 st Terrace & Park	0.30	0.22
90	63 rd & Highland	224.70	0.75
91	59 th & Bellefontaine	9.84	0.07
92	Gregory & Tracy	19.88	11.54
93	Gregory & Tracy	1.00	0.56
94	69 th Terrace & Lydia	5.57	3.98
95	69 th & Flora	7.39	4.23
96	68 th & Woodland	1.63	1.22
97	66 th Terrace & Flora	1.96	0.00
99	56 th & Bellefontaine	4.17	2.67
manholes	various locations	3.68	3.83

1 Projected estimated recreation season overflow volume following implementation of the Overflow Control Plan.

Appendix D

Development of Bacteria Load Duration Curves

Overview

A load duration curve approach was used to develop the TMDLs for the impaired drainage areas of Blue River (WBIDs 0417, 0418, 0419 and 0421) and Indian Creek (WBID 0420). The flow duration curve for this area was developed using a synthetic flow record. The load duration curve method allows for characterizing water quality concentrations (or water quality data) at different flow regimes and estimating the load allocations and wasteload allocations for each impaired segment. This method provides a visual display of the relationship between stream flow and loading capacity. Using the duration curve framework, allowable loadings are easily presented.

Methodology

Using a load duration curve method requires a long time series of flow data, numeric water quality targets, and bacteria data from the impaired streams. Bacteria data from the impaired segments, along with the flow measurements for the same date, are plotted along with the load duration curve to assess when the water quality target is exceeded.

A long record of average daily flow data from a gage or multiple gages that are representative of the impaired reach are used to develop the load duration curve. Therefore, the flow record should be of sufficient length to be able to calculate percentiles of flow (typically 20 years or more). If a flow record for an impaired stream is not available, then a synthetic flow record is needed. To develop a synthetic flow record, a user should calculate an average of the log discharge per square mile of USGS gages from rivers for which the drainage area is contained within a single Ecological Drainage Unit. For this TMDL, six gages with sufficient flow records were available within the Blue River watershed itself (Table D.1). However, because none were directly representative of the stream discharge associated with each of the impaired segments, a synthetic flow record was developed. From this synthetic record, a flow duration curve was developed (Figure D.1).

The selected watershed targets are multiplied by the flow and a conversion factor to generate the allowable load at different flows. With this load duration curve, the targeted concentration is constant at all flow percentiles to reflect the static nature of the water quality standards. The targets used for these load duration curves were the recreation season geometric mean whole body contact recreation category A criterion of 126 *E. coli* counts per 100 mL of water, and the category B criterion of 206 *E. coli* counts per 100 mL of water. The maximum allowable loading capacity is then expressed as a daily target of *E. coli* counts per day across a range of flows.

Table D.1 USGS gage stations used to derive synthetic flow for Blue River and Indian Creek impaired segments

Station Name	Station Number	Drainage Area (mi ²)	Discharge Record Used	Latitude/Longitude	Nash-Sutcliffe Statistic
Blue River at Stadium Dr. Kansas City, MO	06893578	256	2002 – 2010	N39°03'30", W94°30'42"	75%
Blue River at Kansas City, MO	06893500	188	1990 – 2010	N38°57'25.2", W94°33'32"	95%
Blue River at Kenneth Rd. Overland Park, KS	06893100	76	2003 – 2010	N38°50'32", W94°36'44"	46%
Blue River near Stanley, KS	06893080	46	1990 – 2010	N38°48'45", W94°40'32"	99%
Indian Creek at State Line Rd. Leawood, KS	06893390	64	2003 – 2010	N38°56'18", W94°36'28"	89%
Indian Creek at Overland Park, KS	06893300	27	1990 – 2010	N38°56'26", W94°40'16"	95%

Figure D.1 Synthetic flow duration curve, Blue River and Indian Creek

